

# VALIDATION AND VERIFICATION REPORT

**Tradewater – Middle East 3**  
**Reporting Period: November 21, 2025 – December 9, 2025**

**ACR Project ACR1215**  
**Bramsche, Germany**

**March 4, 2026**

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## **1 Introduction**

Tradewater, LLC. (Tradewater) contracted SES, Inc. (SES) to perform the validation and verification of the Tradewater – Middle East 3 project for the reporting period November 21, 2025 – December 9, 2025, with a crediting period of November 21, 2025 – November 20, 2035, under the ACR program. The Project ID is ACR1215. Tradewater is the responsible party for the greenhouse gas (GHG) statement under verification. Tradewater was responsible for the preparation and fair presentation of the GHG statement. SES is responsible for expressing the opinion below on the GHG statement based on the outcome of the validation and verification processes.

### **1.1 Project Overview**

The project involves GHG emission reductions from the destruction of ozone depleting substances (ODS) that would have otherwise been released into the atmosphere. This reporting period consisted of one non-mixed ODS destruction event. The CFC-12 ODS material was collected, recovered, and aggregated by Environmental and Industrial Solutions, Inc. (EIS) from multiple sources in Saudi Arabia. Tradewater purchased the ODS from EIS and transported the ODS from Saudi Arabia to Bramsche, Germany in an International Standards Organization (ISO) tank for destruction at the Remondis Industrie Service GmbH (Remondis) facility. Remondis operates a stationary kiln incinerator (static injection) which destroys ODS at 1,100 degrees Celsius. The Remondis facility meets the Montreal Protocol Technology & Economic Assessment Panel (TEAP) requirements for ODS destruction, achieving >99.99% destruction efficiency.

This reporting period consisted of a single destruction event that began on November 21, 2025, and ended on December 9, 2025. The project destroyed 17,490 kilograms of non-mixed CFC-12. The CFC-12 came from a single source in Dammam, Saudi Arabia.

### **1.2 Objectives**

The objective of the validation is to review the Project Plan and evaluate its conformance with requirements in the ACR Standard and the ACR Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions and Removals from The Destruction of Ozone Depleting Substances from International Sources herein referred to as the Methodology. To accomplish this objective, SES evaluated project planning information, monitoring and reporting procedures, and reported GHG emission reductions.

The objective of the verification is to verify the information in Tradewater’s Monitoring Report is consistent with the GHG Project Plan and to verify Tradewater’s assertion in the Monitoring Report that the project has generated 154,904 tons of GHG emission reductions during the period of November 21, 2025 – December 9, 2025. To accomplish these objectives, SES must be able to verify that the project meets all applicable criteria, and that the quantification of emission reductions is, in all material respects, in conformance with the ACR Standard, the specific requirements for ACR ODS Destruction projects, and confirm that all project calculations are correct.

### 1.3 Scope

The verification covers the period of November 21, 2025 – December 9, 2025. The GHGs addressed are the refrigerant CFC-12 and carbon dioxide (CO<sub>2</sub>). The geographic boundary is the Remondis Destruction Facility in Bramsche, Germany. The organizational and GHG assessment boundaries to be considered are described in the applicable sources, sinks and reservoirs (SSRs):

- SSR 5: Transport to Destruction Facility (CO<sub>2</sub>). Fossil fuel emissions from the vehicular transport of ODS from aggregation point to final destruction facility
- SSR 6: Refrigeration (ODS). Emissions of ODS from use, leaks and servicing through continued operation of equipment. Baseline emissions only.
- SSR 6: Refrigeration (ODS-CO<sub>2</sub>e). Emissions of substitutes from use, leaks and servicing through continued operation of equipment. Project emissions only.
- SSR 7: Destruction (ODS). Emissions of ODS from incomplete destruction at destruction facility
- SSR 7: Destruction (CO<sub>2</sub>). Emissions from the oxidation of carbon contained in destroyed ODS
- SSR 7: Destruction (CO<sub>2</sub>). Fossil fuel emissions from the destruction of ODS at destruction facility
- SSR 7: Destruction (CO<sub>2</sub>). Indirect emissions from the use of grid-delivered electricity

Other scope elements evaluated during the validation and verification activities included:

- Physical infrastructure, activities, technologies, and processes of the GHG project
- Baseline scenarios
- Methods and calculations used to generate estimates of emissions and emission reductions/removal enhancements
- Original underlying data and documentation as relevant and required to evaluate the GHG assertion
- Process information, source identification/counts, and operational details
- Data management systems
- Roles and responsibilities of project participants or client staff
- Quality Assurance/Quality Control (QA/QC) procedures and results
- Processes for and results from uncertainty assessments
- Project-specific conformance to ACR eligibility criteria

### 1.4 Validation and Verification Criteria

The criteria used for this validation and verification are specified in:

- The ACR Standard, Version 8.0, July, 2023; and
- The ACR Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions and Removals from The Destruction of Ozone Depleting Substances from International Sources, Version 1.0, April 2021 (Methodology); the associated Errata and Clarification (E&C) from June 23, 2025; and the Deviation

Requests approved by ACR on November 17, 2025, November 19, 2025, and December 3, 2025.

Validation and verification procedures were based on:

- The ACR Validation and Verification Standard, Version 1.1, May 2018, and
- ISO 14064-3: Specification with Guidance for the Validation and Verification of Greenhouse Gas Assertions, 2019.

The Project Plan, the final version of which is dated March 3, 2026, was compared to the validation criteria. The verification criteria were applied to the project's final GHG assertions as shown on the final Project Monitoring Report, dated March 3, 2026.

### **1.5 Level of Assurance and Materiality**

ACR requires that all verifications be completed based on a reasonable level of assurance. Level of assurance is not applicable to the validation activities. The verification was conducted to ACR's required materiality threshold of +/-5% of the GHG project's emissions reductions or removal enhancements.

## **2 Validation and Verification Process**

SES followed the validation and verification procedures specified by SES's Policies and Procedures Manual and the ACR Standard when it reviewed and analyzed the Tradewater – Middle East 3 project information. The following subsections describe the validation and verification process in more detail.

### **2.1 Pre-Engagement Activities**

The following subsections describe the pre-engagement process for the Tradewater – Middle East 3 project verification.

#### **2.1.1 Conflict of Interest Determination**

Prior to submitting a bid to Tradewater to conduct validation and verification of the Tradewater – Middle East 3 project, SES conducted an internal conflict of interest (COI) review. This review found that the potential for COI was low, so SES proceeded to submit a bid for the project. After Tradewater accepted the bid, SES prepared an ACR COI Attestation form for this project and the project proponent and submitted this form to ACR on November 21, 2025. ACR notified SES that this COI evaluation was approved on November 24, 2025.

#### **2.1.2 Rotation of Validation and Verification Bodies (VVB)**

SES reviewed the ACR Registry and the ACR Facility/Validation and Verification Body Rotation webpage that was last updated on November 3, 2025, prior to its COI submittal. The review of the ACR Registry for Tradewater projects utilizing ACR Methodologies demonstrated that Tradewater had not exclusively used SES for validation and verification services on its last five projects. In addition, SES met the second rotation requirement for single-reporting period projects conducted at the same facility because SES has only conducted one validation and verification of an ODS project destroyed at the Remondis facility.

#### **2.1.3 Validation and Verification Team**

The following individuals comprised the SES validation and verification team for this project:

- Validation/Verification Team Leader (Lead Validator/Verifier): Patrick Splichal
- Independent Reviewer (Senior Internal Reviewer): Rob Dobson
- Validation/Verification Team Member: Erin Manville

#### **2.1.4 Kick-Off Meeting**

An initial kick-off meeting was held by videoconference call on December 16, 2025. Mr. Splichal from SES and Mr. Andre Buiza from Tradewater were participants in the kick-off meeting call. During this call, SES requested the information and data for the Tradewater – Middle East 3 project to enable SES to begin initial validation and verification services. SES also discussed the scope of the verification services, the SES team, and verification schedule. After the call, Tradewater uploaded the first set of verification documents to a third-party file sharing service. SES reviewed these documents to plan for the data checks.

#### **2.1.5 Validation and Verification Planning**

SES prepared a Validation/Verification Plan for the Tradewater – Middle East 3 project. This Plan was communicated to Tradewater. The Validation/Verification Plan identified the Verification Team Members and described the objectives, scope, and criteria for the project. The Validation/Verification Plan also provided an overview of project activities and a proposed schedule for these activities, including the proposed dates for the planning meeting and completion of the validation/verification services. SES completed the planning meeting, interviews with project staff, the final discussion with Tradewater, and submittal of the first draft of the Validation/Verification Report on the dates proposed in the Validation/Verification Plan.

Tradewater provided sufficient information for SES to conduct a strategic analysis to assess the nature, scale, and complexity of the validation/verification services required for the Tradewater – Middle East 3 project, and to conduct a qualitative risk assessment. After conducting the strategic analysis and assessment of risk, SES developed an Evidence-Gathering Plan. The Evidence-Gathering Plan described the amount and type of evidence needed for the validation and verification; provided a ranking of the highest-risk data sources; discussed the risks of errors, omissions or misstatements associated with evidence, and described the methodology for selecting a random sample of data for review.

A summary of the information analyzed in the data checks and document reviews during the desk audit is recorded on the SES ODS Data Check Worksheet (Worksheet) for the project. SES revised the Evidence-Gathering Plan and Worksheet as tasks were completed and new information became available, and then updated and finalized the Evidence-Gathering Plan (including the Worksheet) at the conclusion of verification services. SES will retain, in paper or electronic format, the Verification Plan and Evidence-Gathering Plan and all other material received, reviewed, and generated as part of the verification services for at least two years following the end of the crediting period.

## **2.2 Site Visit**

SES performed a desk-based review of this project. An Industrial Projects Desk-Based Review Request Form for the Tradewater – Middle East 3 project was approved by ACR on November 24, 2025. A site visit was conducted at Remondis on September 9, 2025, for the Tradewater – Middle East 2 project. Mr. Splichal from SES conducted the site visit. During the site visit, SES

assessed GHG project boundaries, site operations, data collection processes, and information management systems, as well as conducted interviews with key project personnel.

### **2.3 List of Findings and Corrective Actions**

During the assessment of GHG data and information, SES identified issues that required corrective action from Tradewater. SES assessed whether these issues could affect the determination of nonconformance or a material misstatement. These issues are summarized in the List of Findings associated with this project (See Attachment A). Tradewater provided clarification as appropriate and made all possible improvements and corrections to the Project Plan and Monitoring Report in response to these findings.

### **2.4 Assessment of Material Misstatement**

SES made an independent calculation of baseline emissions, project emissions, and net emission reductions (ER) to determine if Tradewater's reported ERs are free of material misstatement. SES also assessed whether the procedures used to provide data were in conformance with the ACR Standard and the ACR ODS Methodology. After corrections were made, SES did not identify any errors, omissions, or discrepancies in the calculations. SES's and Tradewater's calculated ERs were identical to two decimal places. This resulted in a 0.00% error, meaning the ER assertion contains no material misstatement.

After a final discussion had occurred with Tradewater, and the corrective action requests had been addressed, and SES determined there was no material misstatement, SES prepared and issued this Verification Report and Verification Statement for the Tradewater – Middle East 3 project. These two documents were reviewed following procedures from SES's Quality Management Plan and ACR Standard. Mr. Dobson, the Independent Reviewer, reviewed these documents and concurred with the Verification Report and Verification Statement. Mr. Dobson maintained independence from the verification services provided for the project. After Mr. Dobson approved the Verification Report and Verification Statement, SES provided Tradewater with the Verification Report and Offset Verification Statement. After a review by Tradewater, SES submitted the Verification Report and Offset Verification Statement to ACR.

## **3 Validation and Verification Findings**

The following subsections contain details about SES's conclusions regarding the Tradewater – Middle East 3 project's conformity to the verification criteria identified in Section 1.4.

### **3.1 Project Boundary and Activity**

The reporting period of this project included one destruction event in which eligible ODS species (CFC-12) was destroyed at a single qualifying destruction facility. The project reporting period occurred from November 21, 2025 to December 9, 2025, well within the Methodology requirement of 12 consecutive months. Remondis issued a Certificate of Destruction (COD) for the destruction event. The ODS was destroyed at the Remondis facility in Bramsche, Germany.

The Project's geographic boundary is the Remondis destruction facility in Bramsche, Germany. The Project's temporal boundary is the reporting period from November 21, 2025 to December 9, 2025. This is one reporting period that is less than 12 months in length, which complies with the temporal boundary stated in the Methodology.

The Project boundary includes fossil fuel emissions from the vehicular transport of ODS from the aggregation point to final destruction facility (SSR 5), emissions of ODS from use, leaks, and servicing through continued operation of equipment, and emissions of substitute refrigerants from use, leaks, and servicing through continued operation of equipment, (SSR 6), and destruction emissions (SSR 7). SSR 6 is applicable to both baseline and project emissions, while the other SSRs are only applicable to project emissions. SES assessed the SSR determination included in the GHG Project Plan and found the justification accurate and in accordance with the Methodology. Overall, Tradewater provided an accurate description of the Project boundary and a comprehensive justification for the project SSRs.

### 3.2 Eligibility

Chapter 3 of the ACR Standard and Chapters 2 and 3 of the Methodology identify criteria that must be met for a project to be eligible for credits. SES reviewed all these criteria for the Tradewater – Middle East 3 project. Based on this review, SES concludes with a reasonable level of assurance that the project meets all of them.

#### 3.2.1 ACR Eligibility

SES confirmed the following ACR eligibility criteria listed in the ACR Standard, Version 8.0 by reviewing the project proponent's Project Plan, Monitoring Report, and calculations as well as other supporting documentation described throughout this report.

- **Start Date:** The project start date is November 21, 2025. This was confirmed by SES through a review of the destruction data provided by the Remondis destruction facility.
- **Minimum Project Term:** Projects with no risk of reversal subsequent to crediting have no required minimum project term.
- **Crediting Period:** The crediting period is ten years from the project start date, which is November 21, 2025 – November 20, 2035.
- **Real:** ODS destruction activities are performed in accordance with an approved ACR methodology to produce verifiable evidence of emissions mitigation. The GHG reductions occurred after the ODS was destroyed.
- **Emission or Removal Origin:** Tradewater retains ownership of emission reductions via contractual agreements with upstream and downstream customers.
- **Offset Title:** Tradewater of Chicago, Illinois, is the Project Proponent. SES reviewed the Refrigerant Transfer of Ownership Agreement (RTOA) between EIS and Tradewater and the Point of Origin (POO) Rider from EIS. These documents demonstrated that Tradewater purchased the ODS material from EIS who transferred “ownership, custody and all rights” to the ODS to Tradewater. The project proponent then destroys the refrigerant at an eligible facility. SES also reviewed an Attestation from Remondis that confirmed that Tradewater retained all environmental attributes from the destruction of the ODS material. SES verified that Tradewater retains all legal claims to the environmental attributes and GHG benefits of the offset project.
- **Leakage:** Leakage does not apply under the Methodology.

#### 3.2.2 Methodology Eligibility

SES reviewed the Project against the ACR Methodology eligibility requirements and confirmed the following:

- The Tradewater – Middle East 3 project collected ODS material in Saudi Arabia.
- The Remondis destruction facility is located at Am Kanal 9, Bramsche, Germany. Latitude: 52.38333, Longitude: 7.9194
- The Remondis destruction facility meets the requirements of the Montreal TEAP standards with an ODS destruction efficiency of >99.99% and emissions levels below those listed in Table 2-1 of the TEAP Standard.
- The refrigerant meets the definition of eligible refrigerant sources, which must originate from equipment, systems, or other supplies outside of the United States.
- This project included one destruction event in which eligible ODS species (CFC-12) was destroyed at a single destruction facility. Remondis issued a Certificate of Destruction for the destruction event.

### **3.2.3 Eligible ODS Sources**

Tradewater supplied documentation including the RTOA and the POO Rider that allowed SES to verify that the CFC-12 refrigerant ODS was sourced in Saudi Arabia. This documentation also demonstrated that the source of the eligible ODS material met the requirements for Chapter 2.2 of the Methodology.

### **3.2.4 Additionality**

No existing laws or regulations mandate the project activity. There are no known requirements to destroy refrigerants in Saudi Arabia. SES reviewed Saudi Arabia’s legislation 01-1443 AH: Waste Management Systems and its Executive Regulations (2021) and 11-1441 AH: Regulation of Ozone Depleting Substances and Hydrofluorocarbons (2020), which states the ODS can be recycled or treated as options, however it does not stipulate or require destruction. The Tradewater – Middle East 3 Project passes the regulatory additionality test.

Per the Methodology, in the Business as Usual (BAU) scenario, the ODS would be used to recharge equipment and be released to the atmosphere due to equipment leaks or the refrigerant would be stored in containers for possible future use. In either scenario, the refrigerant would eventually leak into the atmosphere. By destroying the gas, Tradewater is going beyond the BAU scenario. The Tradewater – Middle East 3 Project passes the performance standard test.

The Tradewater – Middle East 3 Project meets the requirements for the demonstration of additionality specified by the ACR Standard by exceeding the approved performance standard defined in the Methodology and demonstrating surplus to regulations.

### **3.2.5 Regulatory Compliance**

Tradewater provided three EIS licenses: general operation license for a business, an industry license for recycling and reclamation, and a waste management permit specifically for “halons, freon gas, and various refrigerant gases.” As such, EIS is permitted to operate, recycle, reclaim, and manage CFC refrigerants.

EIS’ waste management permit is distributed by the National Center for Waste Management (MWAN), who oversees licensing. MWAN also issues and oversees licensing for the movement of hazardous waste. SES verified that all the licenses were current.

The Remondis destruction facility is certified as a Specialized Waste Management Company (EfbV) in Germany. Remondis has to be periodically audited by a third party for compliance

with the EfbV Ordinance and to maintain their Efb Certificate. The most recent Efb Audit was conducted on March 4, 2025, and a renewed Efb Certificate was granted to Remondis by ENVIZERT on May 13, 2025, which is valid through September 3, 2026. The Efb Certificate specifically includes the storage, treatment, recovery, and disposal of CFCs. In addition, SES reviewed a Valid Import License for Remondis from the European Commission for the import of CFCs.

Remondis is also annually inspected for environmental laws according to the Federal Immission Control Act for air and wastewater emissions. The results of these inspections can be found at a public environmental GIS website entitled: <https://www.umweltkarten-niedersachsen.de>. SES reviewed this website on January 16, 2026, and found that an inspection at the Remondis incinerator, conducted on July 3, 2025, did not identify any serious violations or approval conditions that required an additional on-site inspection within 6 months. A discussion of compliance with the TEAP Standard can be found in Section 3.3.4 of this Report.

Based on this review, SES concludes that the project complies with all environmental laws and regulations directly related to project activities during the reporting period.

### **3.2.6 Permanence**

The emissions reductions from the destruction of ODS can be deemed permanent because the material is permanently destroyed.

### **3.2.7 Independently Validated and Verified**

Tradewater contracted SES to provide independent and objective third-party validation and verification services to the Project. SES is an ANSI National Accreditation Board (ANAB)-accredited and ACR-approved VVB.

### **3.2.8 Environmental and Community Impacts**

The project plan includes a comprehensive summary of the project activity's net positive environmental impacts. Destroying ODS avoids the future leakage of the ODS into the atmosphere. There are no negative community or environmental impacts for this project. The GHG Project Plan also identifies contributions as aligned with relevant sustainable development goals (SDGs) including direct positive impacts for Responsible Consumption and Production (SDG 12.4) and Climate Action (SDG 13.2); and indirect positive impacts for Good Health and Well Being (SDG 3.9), Sustainable Water & Sanitation (SDG 6.3), Life Below Water (SDG 14.1), and Life on Land (SDG 15.1).

Tradewater provided the Environmental and Social Impact Assessment form (E&S Impact Report) per the requirements of Chapter 8 of the ACR Standard. SES applied verification criteria to the project's environmental and community impact assertions as shown in the final version of the E&S Impact Report, dated March 3, 2026. SES confirmed that this project is not a community-based project and that there are no negative environmental or community impacts resulting from this project.

### **3.2.9 Baseline Scenario**

The baseline determines the emissions that would occur in the absence of the project. These chlorofluorocarbon (CFC) refrigerants produced prior to the phasing out of production are either

still in use for outdated or retrofitted equipment, or stored, posing a risk of leakage into the atmosphere. The project activity is the destruction of eligible CFC refrigerants. By destroying these eligible CFCs, the project prevents potential emissions from these ODS materials, aligning with the Methodology's aim to reduce GHG emissions. SES confirmed that the Project Plan appropriately identifies the baseline scenario.

### **3.2.10 Approved Variance or Deviations**

There were three ACR-approved deviation requests for this project. The first deviation request, approved by ACR on November 17, 2025, was for the ODS sample having a moisture content of 206 ppm, which exceeded the saturation point of R-12 at 14°C of 54 ppm. This did not meet the moisture content requirement in Appendix B, Section D, Subsection iii of the Methodology. Tradewater further clarified with SES that Remondis had collected two additional ODS samples, submitted those for analysis, and each of those samples also had high moisture concentrations.

SES believed that the conditions of the Project Deviation Request were followed because (1) Tradewater provided an ODS sample from EIS prior to shipment that showed 10 ppm moisture and an R-12 concentration consistent with the ODS sample taken at Remondis' (2) multiple samples were taken at Remondis all showing high moisture concentrations; and (3) Tradewater removed the moisture weight in its emission reduction calculations.

The second deviation request was for the calibration frequency of scales for non-RCRA facilities at least quarterly to 5% or better accuracy according to Section 6.2.I.B of the Methodology. The front gate truck scales at Remondis are calibrated every two years biennially according to the Measuring and Calibration Ordinance (Ordinance) of the Office of Legal Metrology. Tradewater submitted a Project Deviation Request to deviate from the requirement to calibrate scales quarterly. ACR approved the Project Deviation Request on November 19, 2025. As a condition of the Project Deviation Request, Tradewater agreed to have the scale inspected within three months of the weighing events for this project.

SES verified that the conditions of the Project Deviation Request were followed by (1) reviewing a Calibration Certificate from the Office of Legal Metrology for the front gate scales, dated February 22, 2024, and valid through December 31, 2026; (2) reviewing Section 34 of the Ordinance; (3) reviewing inspections of the scales by the facility on November 20, 2025 showing weight calibration checks demonstrating 5% or better accuracy; and (4) visual observations of the scales and scale reader during the previous site visit.

The third deviation request, approved by ACR on December 3, 2025, was because of the lack of recorded feed rate data from November 21 to November 24, 2025 due to a malfunctioning data logger. SES reviewed a Destruction Journal, remarks in the Flow Rate spreadsheet, and corresponding CEMS data for the remaining required destruction parameters that demonstrated that Tradewater conformed to the deviation request.

### **3.3 Monitoring and Operations**

The monitoring plan described within the GHG Project Plan includes all relevant data and parameters required to obtain a reliable result of generated emission reductions and meets the requirements of the Methodology. The GHG Project Plan includes a complete description of the frequency, responsibility, and procedures for recording, storing, monitoring, and measuring all

project data. All requirements in Chapter 6.1 of the Methodology are addressed in the GHG Project Plan.

The sections below discuss relevant aspects of the GHG Project Plan as they relate to the requirements for data collection and parameters to be monitored in Chapter 6 of the Methodology.

### **3.3.1 Point of Origin Documentation**

SES verified, through the RTOA and the POO Rider supplied by Tradewater, that the ODS material destroyed in the project originated from one source. The aggregation and point of origin facility was EIS, located at 2nd Industrial City, Dammam, Saudi Arabia. SES concludes that the ODS destroyed was eligible and that documentation of its source was adequate.

### **3.3.2 Chain of Custody**

SES verified the Chain of Custody (COC) for the shipment of one ISO tank (EURU 505319-5) of CFC-12 from EIS' warehouse to the Remondis destruction facility. SES reviewed the following COC documents:

- Movement document for transboundary movements/shipments of waste
- Multimodal Dangerous Goods Forms
- Packing List
- Invoices with the carriers
- Bills of Lading/Freight statements

A review of these documents demonstrated that the ISO Tank was shipped on September 21, 2025 from EIS in Dammam, Saudi Arabia and transported by land to the port in Jeddah, Saudi Arabia by Namma Cargo. The ISO was then transported by ship by Hapag-Lloyd to the port in Antwerp, Belgium. Lastly, the ISO was transported by land from the port in Antwerp, Belgium to the Remondis facility in Bramsche, Germany by Mastebroek Transport Meppel, arriving at Remondis on November 6, 2025. SES concluded from these documents that Tradewater documented the custody and ownership of the ODS as required by the Methodology.

During the review of the COC and transport documents, SES also reviewed waste shipment notification approvals from the Saudia Arabian MWAN for the export of the ISO container, from Belgium for transport through their country, and from NGS, the Lower Saxony Organization of Hazardous Waste Disposal, for the import of the ISO container. SES concluded from these notification approvals for the import and export of the ISO container that Tradewater met the requirements of Section 6.1(VIII) of the Methodology.

### **3.3.3 Concentrated ODS Composition and Quantity Analysis**

Eligible non-mixed CFC-12 were aggregated at EIS in Damman, Saudia Arabia and shipped to the Remondis facility in Bramsche, Germany as described above. Upon arrival at Remondis, the container was weighed separately from the transportation vehicle, and weight tickets were retained to establish pre-destruction and post-destruction weights. A single truck scale, Manufacturer: Hofelmeyer Waagen GmbH, Model: HTF: SY01 / HTF600E, Serial Number 1610532-Scale Reader, at the Remondis front gate was used for the weigh-ins.

SES reviewed the weight tickets for the destruction event and confirmed that the same scale was used for beginning and ending weights, that the weights were recorded no more than 48 hours prior to the beginning of the event nor 48 hours after the ending of the event, and that two beginning and two ending weight tickets were generated at least three minutes apart. The starting weight was recorded at 11:20 a.m. and 11:24 a.m. local time on November 21, 2025, as 28,300 kg. The ending weight for this destruction event was recorded as 10,810 kg at 10:35 a.m. and 10:39 a.m. local time on December 10, 2025. SES also verified that the difference in full and empty weight as measured by the weight tickets matched the value on the COD.

As described above in Section 3.2.10 of this Report, SES reviewed the calibration records for the scales from February 22, 2024. The calibration certificate indicated it was valid until December 31, 2026. The calibration frequency met the biennial frequency specified in the Ordinance. SES also reviewed facility inspection records of the scales from November 20, 2025 and found the calibration checks demonstrated the scales’ accuracy was within 5% of reading for the period prior to this destruction event.

A total of three ODS samples were taken from the ISO container because of high moisture. Mr. Bas Tieke, a Remondis-trained gas sampling technician, took the samples. By reviewing Remondis’ “ODS Sampling Certificate” and associated chain-of-custody documentation, SES verified that all sampling requirements of the Methodology were met and appropriate records were retained. The samples were shipped off-site to an ISO/IEC 17025 accredited-laboratory, Bureau Veritas (BV), for analysis by gas chromatography according to the analytical procedures in Appendix C of the Air-conditioning, Heating, and Refrigeration Institute (AHRI) 700 Standard. Table 1 summarizes the analytical results from Sample 1.

**Table 1. Summary of Analytical Results**

<b>Certificate ID</b>	<b>Sample #</b>	<b>Eligible ODS%</b>	<b>Moisture (parts per million)</b>	<b>Moisture Saturation (ppm)</b>	<b>% High Boiling Residue</b>
SA2025M WAN34-02	SA2025MW AN34-02-S1	CFC-12: 99.86	206	54	0.41

Except for the moisture content as described above in Section 3.2.10, the remaining parameters of the AHRI-700 analysis exceeded the requirements of the Methodology and demonstrated the type of refrigerant in the in the ISO container for the destruction event.

**3.3.4 Destruction Facility Requirements**

The Remondis facility is not located the United States. Therefore, the facility must have third-party confirmation of compliance with TEAP requirements, in addition to meeting the TEAP requirements during each destruction event. SES reviewed the most recent Destruction Removal Efficiency (DRE) test from January 2025 certified by TÜV SÜD, which showed the DRE of the incineration system using CFC-11 fed at a rate of 106 kg/h of >99.99%. In addition, the pollutant emissions measured during the DRE testing were all below the allowable limits in Table 2-1 of the TEAP Standard. SES confirmed that the Remondis destruction facility meets the TEAP requirements in the Methodology.

SES verified both the regulatory compliance of the destruction facility and its conformity with the requirements of the Methodology and TEAP requirements during the destruction event. The continuous emissions monitoring system (CEMS) parameters are monitored continuously (every second) and recorded every 10 minutes or 30 minutes (depending on the parameter) and data are downloaded into a pdf format or to Excel. The 10- and 30-minute average data are also reported to the local German environmental authorities for regulatory compliance purposes. The following information was tracked during the destruction event:

- Date and time
- ODS feed rate (kg/h) – recorded separately every 30 seconds (except as described in the ACR-approved deviation request)
- Temperature (°C)
- Pressure (mBar)
- Carbon Monoxide (CO) emissions (ppm)
- Effluent flow rate (m<sup>3</sup>/h) – Not applicable as no wastewater discharge from the process
- Effluent pH level – Not applicable as no wastewater discharge from the process

SES reviewed data from the CEMS to confirm that the facility was operating similarly to the period during which the DRE was determined. The destruction unit has a supervisory control and data acquisition (SCADA) system that controls the plant based on operating and CEMS data. SES reviewed Remondis' control room and observed the SCADA interface during the site visit to confirm this. There were no instances of shutdowns due to emission limit exceedances during this destruction event. The local German authorities also have the capability of shutting down the incinerator if exceedances occur.

Lastly, in conformance with the E&C from July 23, 2025 pertaining to Section 6.2 of the Methodology, SES confirmed that a Functional Test of the CEMS equipment was performed by TÜV SÜD September 1-4, 2025, which showed the CEMS equipment was performing satisfactorily. This Functional Test is valid for one year, which would encompass this reporting period. In addition the TÜV SÜD report indicated the CEMS calibration was valid until February 18, 2026.

### **3.3.5 Certificate of Destruction**

SES confirmed that the Certificate of Destruction contained the Methodology required parameters.

- Project Proponent
- Destruction facility
- Certificate of Destruction ID number
- Serial, tracking, or ID number of all containers for which ODS destruction occurred
- Weight and type of material destroyed from each container
- Destruction Start Date
- Destruction End Date

### **3.3.6 Data Management Systems**

SES interviewed key personnel from Tradewater and the Remondis destruction facility who were responsible for the project to gain an understanding of the controls put in place to account for

refrigerant recovered, aggregated, and destroyed. SES reviewed Tradewater’s processes for data collection and management and determined that they were sufficient to meet all ACR and Methodology requirements.

### 3.3.7 Emissions Reductions

SES separately calculated project emission reductions from information on the weight tickets, independent laboratory analysis reports, and the COD. SES’s calculations assessment included confirming the weight total as defined by the weight tickets from Remondis. SES verified that the constants, default factors, and emission factors were correctly applied in Tradewater’s assertion. SES verified that the raw data inputs were correct, and the formulas were applied correctly. Table 2 shows a summary of SES’s and Tradewater’s ER calculations and where/if any discrepancies occurred.

**Table 2. Comparison of SES and Tradewater ER Calculations**

<b>Destruction Event</b>	<b>SES Baseline Emissions CO<sub>2</sub>e (metric tons)</b>	<b>Tradewater Baseline Emissions CO<sub>2</sub>e (metric tons)</b>	<b>SES Project Emissions CO<sub>2</sub>e (metric tons)</b>	<b>Tradewater Project Emissions CO<sub>2</sub>e (metric tons)</b>	<b>SES Emission Reductions CO<sub>2</sub>e (metric tons)</b>	<b>Tradewater Emission Reductions CO<sub>2</sub>e (metric tons)</b>
SA2025 MWAN34-02	169,156.4	169,156.4	14,252.1	14,252.1	154,904.3	154,904.3

SES confirmed that Tradewater’s calculated ER totals in conformance with the Methodology. SES performed a final calculation to determine if a material misstatement was present using the equation in Chapter 9.B of the ACR Standard. This equation is shown below:

$$\% \text{ Error} = (\text{Project Emission Reduction Assertion-Verified Emission Reduction Recalculation}) / (\text{Verified Emission Reduction Recalculation}) * 100$$

After corrections were made, SES did not identify any errors, omissions, or discrepancies in the calculations. SES's and Tradewater's calculated ERs were identical to two decimal places.

$$\% \text{ Error} = (0/154,904) * 100\% = 0.000\%$$

Because the % Error is much less than the 5% defined by ACR, SES concludes with reasonable assurance that the ER assertion contains no material misstatement.

## 4 Validation Conclusions

SES confirms that the GHG Project Plan for Tradewater – Middle East 3 Project conforms to the ACR Standard Version 8.0, and the Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions and Removals from the Destruction of Ozone Depleting Substances from International Sources, Version 1.0 (April 2021). No qualifications or limitations exist with respect to the validation opinion reached by the validation/verification team.

**5 Verification Conclusions**

Based on the verification activities described above, SES concludes, with a reasonable level of assurance, that Tradewater’s assertions of ER generated from ODS destruction are consistent with the verification criteria and free of material misstatements. The verified ER total is 154,904 metric tons CO<sub>2</sub>e for the period of November 21, 2025 – December 9, 2025. Table 3 summarizes the ER calculations for this reporting period.

**Table 3. Emission Reductions Verified for November 21, 2025 – December 9, 2025**

<b>Emissions Verified</b>	<b>CO<sub>2</sub>e (metric tons)</b>
Baseline Emissions	169,156
Project Emissions	14,252
Emission Reductions	154,904

**6 Signatures**

Lead Validator/Verifier Signature:



Date: March 4, 2026

Independent Reviewer Signature:



Date: March 4, 2026

**ATTACHMENT A**  
**LIST OF FINDINGS**

List of Findings  
 Tradewater - Middle East 3, ACR1215  
 VVB: SES, Inc.  
 Reporting Period: November 21-December 9, 2025

Type of Issue	Finding	Citation (Program Standard or Protocol/ Methodology Section)	Category (Misstatement/ Non-Conformance)	Corrective Action
Additional Documentation Request	Please provide an executed agreement between Tradewater and Remondis or an Attestation from Remondis demonstrating that Tradewater retains ownership of the environmental attributes of the destroyed ODS material.	ACR Standard Chapter 3 and 6.B.	Potential non-conformance	Tradewater provided the Attestation. Finding closed.
Clarification Request	The POO Rider signed by EIS states the ISO was shipped on September 21, 2025, however, Box 8.a. on the "Movement document for transboundary movements/shipments of waste" states the ISO left EIS on September 22, 2025. Please clarify which date is correct.	ODS Methodology Section 6.1, III	Potential non-conformance	Tradewater explained that the ISO left the EIS facility on September 21, 2025. The different dates reflected are present due to back and forth that occurred around the time regarding pick up time and date, but the most accurate date is September 21, 2025. Finding closed.
Clarification Request	For the land transport of the ISO container from Antwerp, Belgium to Remondis in Bramsche, Germany by Mastebroek Transport Meppel, please clarify if there is an accompanying Bill of Lading.	ODS Methodology Section 6.1, III	Potential non-conformance	Tradewater explained that there is no separate BoL. The document that contains information that one would find in a BoL is the Movement Document, which Tradewater had provided. Finding closed.
Clarification Request	The EIS Operating License expired on November 22, 2024. The Attestation from EIS states that EIS "applied for renewal in November 2024 and have not been issued the renewed license. As our application remains under review, we are permitted to continue operating despite the expiration of the previous license." This Attestation is dated May 11, 2025. Please clarify if there are any updates to the status of the EIS Operating License.	ODS Methodology Section 3.7	Potential non-conformance	Tradewater clarified that there are no updates to the status of the EIS Operating License, and EIS can continue operating while their application remains under review. Finding closed.
Additional Documentation Request	Please provide scale inspection records from within 3 months of the weighing events for this destruction event. The inspection records provided were from August 2025.	ODS Methodology Section 6.2, Deviation Request	Potential non-conformance	Tradewater provided a November 2025 scale inspection form. Finding closed.
Clarification Request	Please clarify how many ODS samples were collected and submitted for analysis at Bureau Veritas (BV), as some of the sampling and transport documentation shows two and some shows three.	ODS Methodology Appendix B(C)	Potential non-conformance	Tradewater clarified that three ODS samples in total were collected and submitted for analysis at BV. Finding closed.

List of Findings  
 Tradewater - Middle East 3, ACR1215  
 VVB: SES, Inc.  
 Reporting Period: November 21-December 9, 2025

Type of Issue	Finding	Citation (Program Standard or Protocol/ Methodology Section)	Category (Misstatement/ Non-Conformance)	Corrective Action
Clarification Request	If three ODS samples were analyzed by BV, please clarify if all three ODS samples showed high moisture concentrations.	ODS Methodology Appendix B(D), Deviation Request	Potential non-conformance	Tradewater clarified that all three ODS samples showed high moisture concentrations. Finding closed.
Clarification Request	The ODS Moisture Deviation request states the moisture saturation for R-12 is 54 ppm, but the Sampling Tab in the Project Assertion Spreadsheet shows it as 65.9 ppm. Please clarify the discrepancy.	ODS Methodology Appendix B(D), Deviation Request	Potential non-conformance	Tradewater corrected the moisture saturation to 54 ppm in the Project Assertion Spreadsheet. Finding closed.
Clarification Request	Please provide proof of receipt by BV for ODS Sample SA2025MWAN34-02-S1.	ODS Methodology Appendix B(C)(g)	Potential non-conformance	Tradewater provided proof of receipt by BV. Finding closed.
Clarification Request	The ODS analysis of the ISO container prior to shipment shows non-volatile residue/high-boiling residue (HBR) to be 6.1%, but the ODS analysis by BV shows the HBR to be 0.41%. Please explain the large difference in values.	ODS Methodology Appendix B(C)	Potential non-conformance	Tradewater clarified that the EIS sample is taken after the ISO tank has spent some time in storage at the EIS facility. While the ISO tank is stored, stratification occurs, and the acquired sample is more likely to collect higher density material, resulting in a higher HBR. In contrast, the Remondis sample is taken after the ISO tank has been moved as a result of shipment, and the acquired sample at Remondis is less likely to collect higher density material, resulting in a lower HBR that is ultimately more representative of the contents of the ISO tank. Finding closed.
Clarification Request	There was one 30-minute average CO value of 101 ppm at 4:00 a.m. on November 30, 2025. This is an exceedance of the 100 ppm CO value per the emission limits for waste incineration plants according to the Federal Immission Control Act. Please clarify if this exceedance will result in a violation or non-compliance from the German Environmental Authorities and/or if there were measures that Remondis took that were compliant with the Federal Immission Control Act.	ODS Methodology Section 2.1(II), and 3.7	Potential non-conformance	Tradewater clarified that a one-time breach of the half-hour limits does not count as an instance of non-compliance. Non-compliance instances are only when the day limits are breached, and it would depend on which co-pollutants are breached. In this case, Remondis performed reconciliatory action to limit the CO emissions shortly after they were breached in order to get the CO emissions to fall under the limit, which was achieved in the following 30 minute reading at 4:30 AM on November 30, 2025. Finding closed.

List of Findings  
 Tradewater - Middle East 3, ACR1215  
 VVB: SES, Inc.  
 Reporting Period: November 21-December 9, 2025

Type of Issue	Finding	Citation (Program Standard or Protocol/ Methodology Section)	Category (Misstatement/ Non-Conformance)	Corrective Action
Additional Documentation Request	The document entitled "Bericht über die Durchführung von jährlichen Funktionsprüfungen," which is the Report on conducting annual functional tests of continuously operating emission measurement systems is for the August 2024 testing, states that the next functional tests were to occur in August 2025. Please provide the Report for the August 2025 Annual Functional Testing.	ODS Methodology Section 6.2, E&C dated 6/23/25	Potential non-conformance	Tradewater provided a Functional Testing Report from September 2025. Finding closed.
Clarification Request	In an email from January 13, 2026, TW indicated that the code GGB 5 in the CEMS data indicated the valve was open to feed material from the ISO Tank to the incinerator. However, the entire CEMS data set shows the code GGB 5 even when there is no flow indicated in the "Flowrate" Excel file.	ODS Methodology Section 6.1, VI, Deviation Request	Potential non-conformance	Tradewater explained the GGB 5 code indicates whether the main CEMS computer cut the flow, not whether the control room regulated the flow. In the instances where the GGB5 is present even when there is no flow indicated in the flow rate excel file, it occurred in situations where the control room regulated the flow. During the time when the data logger was not working, there were no abnormal emission values registered, so there was no time when the CEMS computer had to cut the flow. Finding closed.
Non-conformance	Question 1.B. in Section VIII of the Monitoring Report does not show the date of the last verification.	ACR Standard 6.E	Potential non-conformance	The date of the last verification was added to the description in the Monitoring Report. Finding closed.