



Nasstar Carbon Reduction Plan

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Class 2 - General Internal Use

Carbon Reduction Plan

Supplier name: **Nasstar Group Limited**

[Includes the carbon reduction plan and associated commitments for the wholly owned and fully consolidated subsidiary, **GCI Network Solutions Ltd**]

Publication date: [13/05/2022]

1 Overview

The UK Government amended the Climate Change Act 2008 in 2019 by introducing the target of at least a 100% reduction of greenhouse gas emissions compared to 1990 levels by 2050. This is known as the 'Net Zero' Target.

All Central Government Departments, their Executive Agencies and Non-Departmental Public Bodies in conducting procurement procedures are regulated by the Public Contracts Regulations 2015. Since 30th September 2021 all new procurement is subject to the application of (PPN) 06/21, "Procurement Policy Note – Taking Account of Carbon Reduction Plans in the procurement of major government contracts". This states how, when procuring major contracts, UK Government requires in scope organisations to accounts for suppliers' Net Zero Carbon Reduction Plans.

This plan sets out Nasstar Group Limited's ("Nasstar") Carbon Reduction Plan ("CRP") and has been developed in line with PPN 06/21. This summary document provides the high-level information to demonstrates compliance.

Nasstar Group Ltd delivers integrated IT and communications related services to a range of organisations and businesses. These include managed IT services, cyber security solutions, cloud, collaboration and communication systems, PCI and Self-service, and managed network services.

In providing these services, the bidding entity, GCI Network Solutions Ltd, depends on the integrated nature of Group to provide services offered. As the business has grown with acquisition significant efficiency gains through rationalisation, and the and activities that on to deliver the services it provides]

2 Commitment to achieving Net Zero

Nasstar is committed to achieving Net Zero emissions by 2050 as defined in this Plan. All Nasstar Group companies that are fully owned subsidiaries and are in the operational and financial control of Nasstar are included in and shall adopt and support this Plan. The objectives of this Carbon Reduction Plan are included and align with the strategic plans of Nasstar.

The requirement and measures as summarised in this CRP apply to the bidding entity, GCI Network Solutions Ltd., when performing the relevant contract(s).

The approved CRP shall be published on the Nasstar Group website, and a copy will be provided on request. The CRP shall be subject to version control and links to previous versions shall be made publicly available.

3 Baseline Emissions Footprint

Baseline emissions are a record of the greenhouse gases that have been produced in the past and were produced prior to the introduction of any strategies to reduce emissions. Baseline emissions are the reference point against which emissions reduction can be measured.

Baseline Year: 2021 (1st January – 31st December)

Additional details relating to the Baseline Emissions calculations

Organisational boundary considerations - Nasstar’s business has operations and activities in the UK and Internationally. Environmental commitments and targets for all parts of the business are set at a Group level. For clarity, in this document, the emissions data provided relates only to Nasstar’s UK operations. International emissions data is not included.

This document covers Nasstar’s full UK operational scope for the specified period including all UK legal entities within the Group who are all subject to the same carbon reduction commitments and initiatives laid out below. The carbon footprint of all legal entities is measured and included in the numbers presented below, and in general as part of the company's UK carbon footprint reporting. These subsidiaries are all subject to the same carbon reduction commitments and initiatives laid out below and includes GCI Network Solutions Limited.

Nasstar frequently acquires other companies. The acquired entities appear as wholly owned subsidiaries for between six months to two years after acquisition whilst the business is integrated into Nasstar. After integration is complete the entities are made dormant. On 1st August 2021 Nasstar Group Limited completed the acquisition of the National Information Communication Technology services business of KCOM. The greenhouse gas emissions of the enlarged group differ significantly from the previously Nasstar reported SECR figures. This a direct result of the greater energy use across the wider portfolio and the increase in number of employees and their associated business travel.

Nasstar’s reporting period begins on 1 January and ends on 31 December in line with its financial year. Our baseline year for emissions is the current financial year 2021, also known as FY21. Therefore, the in this version of the CRP both the baseline and the reporting period covers 1 January 2021 through 31 December 2021.

Methodology

Our methodology for measuring our carbon footprint is compliant and done in accordance with the Greenhouse Gas Protocol. All emissions from greenhouse gases (GHGs), including those in the Kyoto Protocol basket of GHGs, are measured and converted into metric tonnes of CO2 equivalent (mtCO2e).

Emissions data is reported in line with the GHGP Corporate Accounting and Reporting Standard under the 'Operational Control' approach. Scope 2 emissions are calculated using the invoice data and Government conversion factors for company reporting of greenhouse gas emissions. Per the GHGP, where market-based information is not available, location-based results have been used as proxy.

Details of Scope 3 emissions included

Scope 3 emissions represent up to 80% of many organisation’s carbon emissions. There are 15 categories of Scope 3 emissions defined by the GHG Protocol. We describe below our approach to emissions for the five required categories as detailed in the technical standard to PPN 06/21. Further detail on these plus additional category Scope 3 emissions will be included and published in future and subsequent annual reports.

Category 4: Upstream transportation & distribution	Upstream transportation and distribution losses to electricity supplied are included. Allowance has been made for upstream supply of services in the form of third-party data centres, as these are directly interchangeable with emission due to the operation of directly operated data centres.
Category 5: Waste generated in operations	These are addressed as part of the existing Nasstar ISO 14001 programme. The quantification of emissions associated with the disposal and treatment of waste generated in operations is not currently included. Emissions from waste management suppliers will be included in future updates to this CRP.
Category 6: Business travel	Emissions due to the transportation of employees for business related activities during the reporting year (in vehicles not owned or operated by Nasstar) are included.
Category 7: Employee commuting	Due to the disruption to normal working patterns because of Covid-19 an assessment of employee commuting has not been included at this stage. Future updates to this CRP will include employee commuting.
Category 9: Downstream transportation & distribution	Nasstar and is a service provider and does not produce or distributes products. There are no scope 1 or scope 2 emissions from transportation providers, distributors or retailers.

Baseline year emissions: 2021 adjusted for KCOM acquisition

EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	23.4 [Gas used in offices]
Scope 2	2,171.3 [Electricity used for operations & in offices]
Scope 3 (Included Sources)	8.8 [Business related travel] 721.0 [Third party data centres] 40.8 [Electricity T&D losses]

NASSTAR

Total Emissions	2,965.2
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4 Current Emissions Reporting

Reporting Year: FY 2021 *SECR (includes KCOM from 1 st Aug 2021)	
EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	14.1 [Gas used in offices]
Scope 2	959.5 [Electricity used for operations & in offices]
Scope 3 (Included Sources)	7.1 [Business related travel] 300.4 [Third party data centres] 18.0 [Electricity T&D losses]
Total Emissions	1,299.1

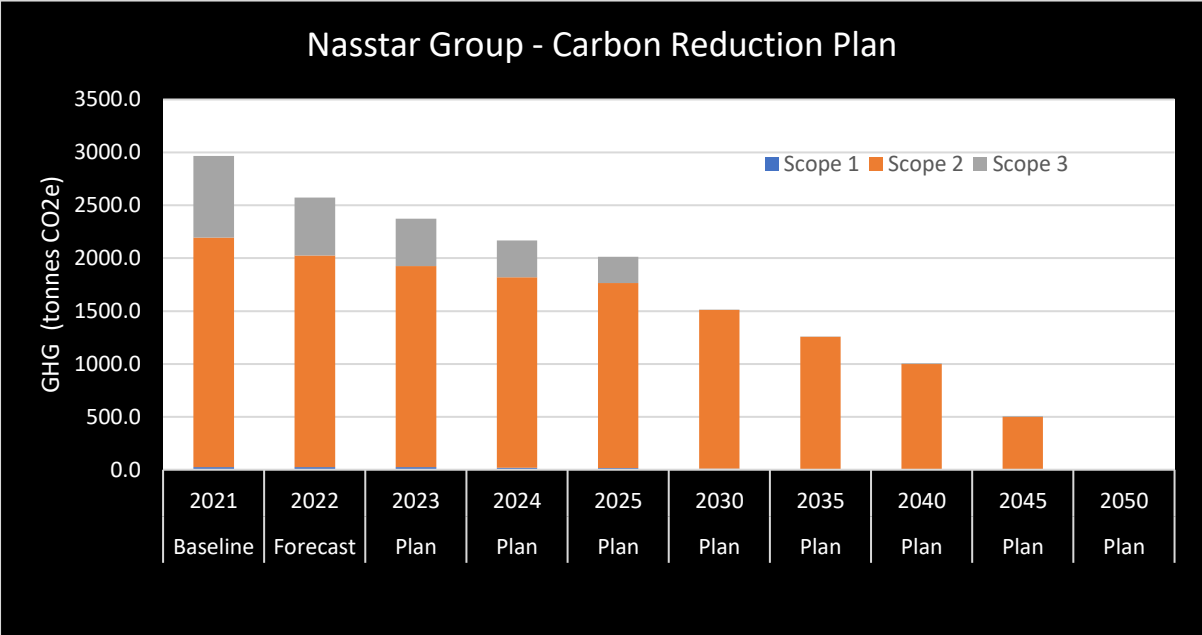
5 Emissions reduction targets

Nasstar’s emissions targets align with our strategy to protect the environment within our sphere of influence and to achieve “Net Zero” from our UK activities by [2050].

Our near-term [next 5 years] carbon reduction targets, set out below, will be delivered by the planned carbon reduction initiatives set out in the following section.

We project that greenhouse gas emissions will decrease over the next five years to **2,012** tCO₂e by 2025. This is a reduction of **32%**.

The Company is actively developing a detailed roadmap to reach Net Zero in the UK in 2050 and anticipates that further specific details will be available in future reports.



6 Carbon Reduction Projects

Completed Carbon Reduction Initiatives

The following environmental management measures and projects have been completed or implemented within Nasstar prior to the end of FY 2021.

- Commence decommissioning of the KCOM long distance network
- Development of our ISO14001 certification
- Implementation of energy efficiency measures in Alford and Salford Data Centres
- Procurement of renewable electricity for Alford and Salford data centres with zero carbon intensity.

Planned Carbon Reduction Initiatives

In the future we will implement further measures that include:

- Continued decommissioning of the KCOM long distance network and pops
- Rationalisation of sites, network distribution points and data centres.
- Procurement of electricity from renewable energy sources.
- Expansion of our ISO14001 certification to more locations
- Investigate the potential for on-site renewable energy installations and energy storage facilities
- Increased focus on the management and monitoring of waste
- Extending educational awareness and training
- Additional LED lighting upgrades
- Further quantification and understanding of value chain environmental impacts
- Engaging the supply chain to manage and reduce our Scope 3 carbon emissions

7 Declaration and Sign Off

This Carbon Reduction Plan has been completed in accordance with PPN 06/21, the associated guidance and the technical standard for Carbon Reduction Plans.

Emissions have been reported and recorded in accordance with the published reporting standard for Carbon Reduction Plans and the GHG Reporting Protocol corporate standard¹ and uses the appropriate Government emission conversion factors for greenhouse gas company reporting².

Scope 1 and Scope 2 emissions have been reported in accordance with SECR requirements, and the required subset of Scope 3 emissions have been reported in accordance with the published reporting standard for Carbon Reduction Plans and the Corporate Value Chain (Scope 3) Standard³.

This Carbon Reduction Plan has been reviewed and signed off by the board of directors on [May 2022].

Signed on behalf of the Nasstar Group Ltd by:

Wayne Churchill, CEO

Date: [May 2022]

¹ <https://ghgprotocol.org/corporate-standard>

² <https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>

³ <https://ghgprotocol.org/standards/scope-3-standard>

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