



Carbon Reduction Plan

2022



Commitment to achieving net zero

Freshwave Group is committed to achieving net-zero emissions no later than 2050 and is working to achieve this by 2030.

Freshwave Group (Freshwave) is committed to achieving a near-term carbon neutrality target for scope 1 and 2 emissions by 2025. In alignment with the United Kingdom (UK)'s net-zero strategy, Freshwave is committed to achieving net zero for our scopes 1, 2 and 3 emissions by no later than 2050, against a 2021 baseline year. In addition, we are working to achieve net zero by 2030 to meet our investor's (DigitalBridge) ambition. This supports the Paris Agreement's goal to reduce greenhouse gas emissions to a level consistent with what is required to limit global warming to well below 2 degrees Celsius (°C) and preferably to 1.5°C.



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 reductions can be measured.

Baseline Year: 2021

Additional details relating to the baseline emissions calculations:

Freshwave's 2021 baseline represents our current position and will enable us to track progress against our targets. 2021 is the first year we have calculated our footprint, coinciding with the development of our sustainability strategy.

More information on Freshwave's sustainability strategy is available on the Sustainability page on our website.

Freshwave's scope 1, 2 and 3 emissions are calculated in line with the Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard¹. Our calculations prioritise consumption data where available, and estimates derived from industry-standard benchmarks where not.

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



Scope

1

Encompasses Freshwave's direct emissions, including those associated with the direct consumption of gas and fuel.

Scope

2

Encompasses indirect emissions, including those associated with the purchase and consumption of electricity and heating. Scope 2 emissions are calculated using the GHG Protocol's location-based methodology.

Scope

3

Encompasses other indirect emissions. The scope 3 figures reported in this Carbon Reduction Plan (CRP) include only the following subset of emissions as per the Technical Standard guidance. These are:

- ✔ upstream transportation and distribution;
- ✔ waste generated in operations;
- ✔ business travel;
- ✔ employee commuting; and
- ✔ downstream transportation and distribution.



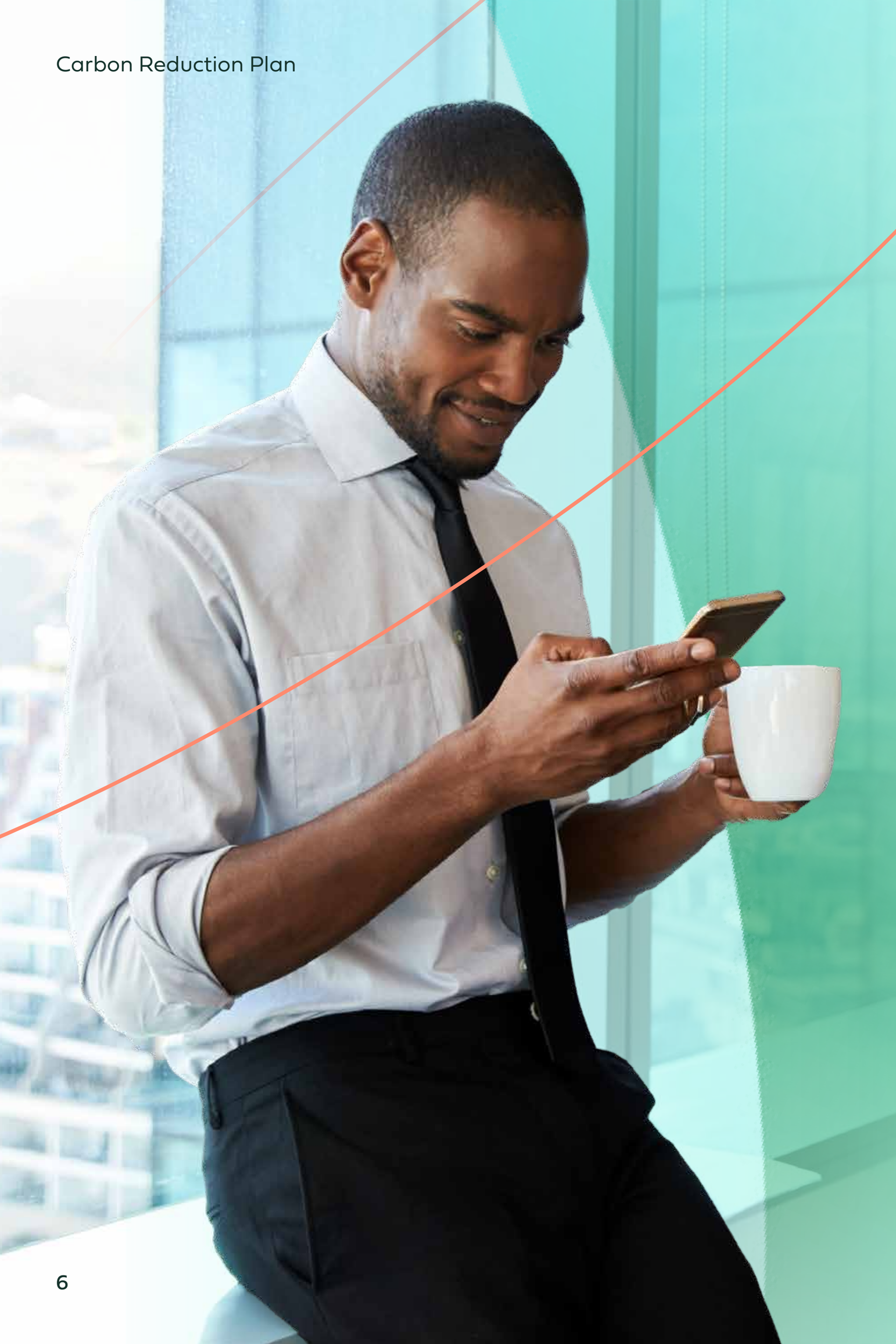
Baseline year emissions: 2021 (01 January 2021–31 December 2021)	
EMISSIONS	TOTAL (tCO₂e)
Scope 1	15.23
Scope 2	15.55
Scope 3	111.49
Business travel	39.80
Employee commuting	28.97
Waste generated in operations	28.23
Upstream transportation and distribution	14.49
Downstream transportation and distribution ²	0.00
Total emissions	142.28³

Current emissions reporting

As this is the first reporting year against the Public Procurement Notice (PPN), both the baseline and actual data sets are for the reporting year 2021 (01 January 2021–31 December 2021).

² Freshwave is assessing all transportation and distribution emissions but is not able to separate upstream and downstream emissions. This report, therefore, combines all transportation and distribution emissions into the upstream total.

³ Due to rounding, total emissions do not equal the sum of the listed line items.



Emissions reduction targets

In order to continue our progress toward achieving net zero, we have adopted the following carbon reduction targets.



Achieve carbon neutrality for scope 1 and 2 GHG emissions by 2030.



Reduce scope 3 emissions by 40% by 2025 from a 2021 baseline.



Achieve net-zero GHG emissions across all scopes no later than 2050.



Freshwave carbon reduction: pathway to net zero

Projected emissions reductions in line with these targets are illustrated in the graph opposite.

Please note: the commitments in this plan will be adopted and delivered by any wholly owned subsidiaries of Freshwave Group, including Freshwave Services Limited and Freshwave Facilities Limited, both separate of and also when performing contracts.

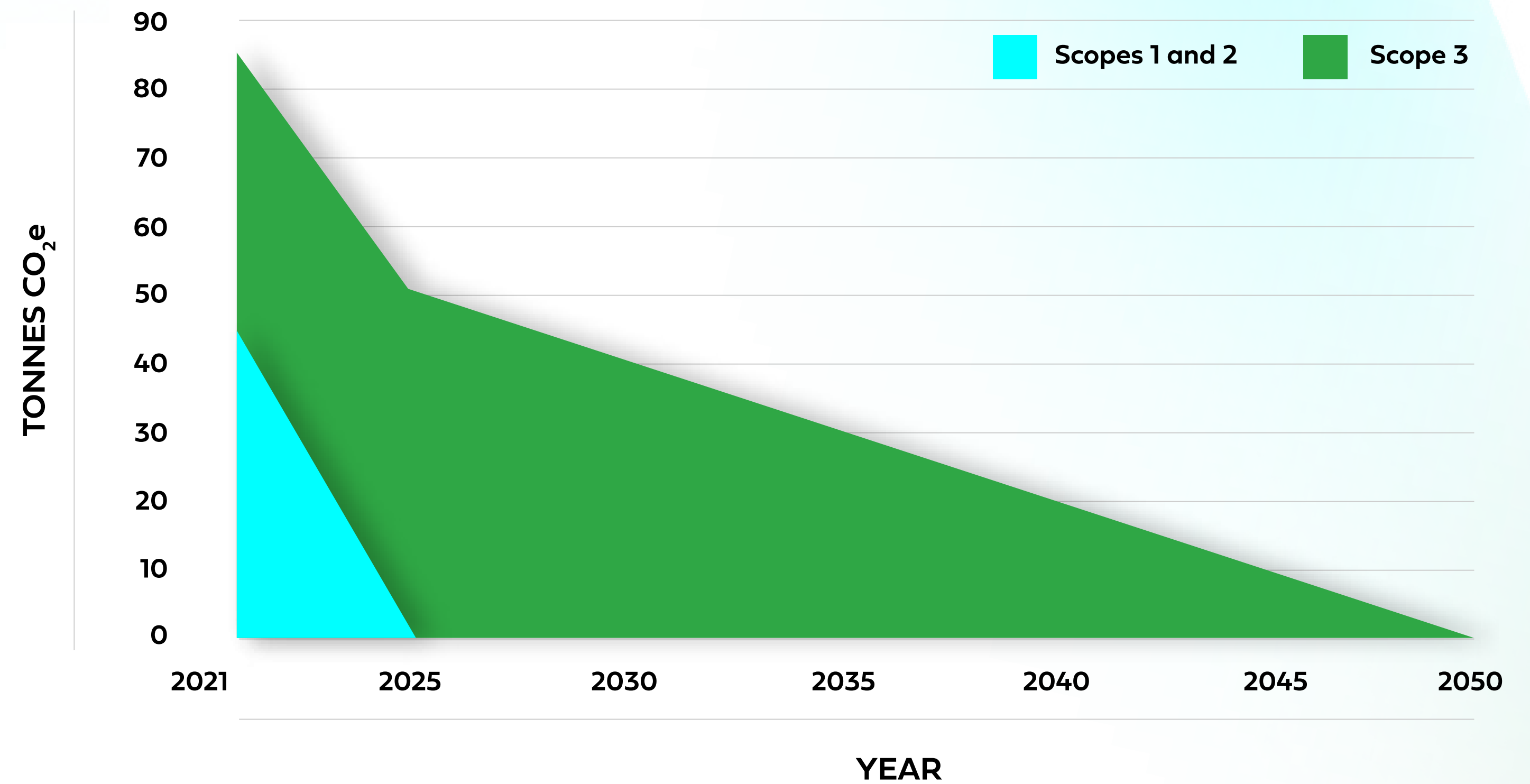


Figure 1. Freshwave’s projected emissions reductions across scopes 1, 2 and 3 from 2021 to 2050.



Completed carbon reduction initiatives

The following environmental management measures and projects have been completed or implemented since the 2021 baseline. These initiatives have improved efficiencies and will contribute to our overall net-zero ambition.



ISO 14001:2015 Environmental Management System (EMS)

Freshwave operates an Environmental Management System certified to the ISO 14001:2015 international standard. As part of our system, we have identified energy use and waste generation as environmental aspects under our control and within our sphere of influence. As such, we have objectives and targets to minimise our impacts.



EcoVadis accreditation

In 2021, Freshwave achieved the EcoVadis sustainability gold medal for our mast division. This achievement reflects the quality of our environmental management system and the implementation of operational procedures and processes that sit specifically within those related to waste and carbon management. Our procedures consider the lifecycle of products and services and demonstrate a commitment to continuously reduce our environmental impact.



Employee engagement

Freshwave has taken a strategic approach to engage with its employees and establish shared ownership of carbon emissions. In 2021, we refined our environment policy and developed a carbon management policy to raise awareness of our commitment to carbon reduction. This was communicated to all employees. Moreover, we support flexible and hybrid working models, which reduces the need to travel to our offices and the energy required onsite throughout the day.



Building Management Systems (BMS)

Freshwave relocated its head office at the end of 2021. We considered building efficiency as part of the decision-making process. Our new office was built using sustainable construction processes and materials with an energy performance certificate (EPC) rating of A. To complement this, the building is connected directly to the district heating and cooling system Citigen. Citigen, a natural-gas-fuelled system, recovers waste heat from engine exhausts, turbochargers, jacket cooling and lubricating oil and transfers it via heat exchangers to the network, increasing efficiency. For our older and smaller offices, Freshwave operates a turn-off policy for lights and equipment to reduce energy use.



Future carbon reduction initiatives

The initiatives mentioned above focus predominantly on reductions in scope 1 and 2 GHG emissions. In the future, Freshwave will implement further measures to reduce our carbon emissions across all scopes, including scope 3.

Supplier engagement

Freshwave intends to work with its supply chain partners to improve efficiency and develop innovative solutions to network infrastructure. Prospective initiatives include water-based cooling solutions and masts powered through integrated small-scale wind turbines and solar photovoltaics.

To complement this and build on our EcoVadis supplier recognition, we will strengthen our approach to managing our supply chain. By transitioning our Supplier Code of Conduct into a Supply Chain Charter, Freshwave will take a stronger stance towards the integration of energy management into our supply chain and procurement processes.

Waste reduction and recycling programme

As part of our commitment to reducing scope 3 emissions, Freshwave will take steps to realise its Waste Minimisation Policy. At Freshwave's offices, we will communicate recycling and waste disposal expectations, focusing on waste electrical and electronic equipment (WEEE) recycling. Freshwave has partnered with Switch on the Future to connect children and facilitate the transition to e-learning. Through the scheme, laptops and associated hardware are repaired and donated, resulting in a reduction of harmful waste in landfill and tackling digital inequality. Freshwave will continue with this initiative and explore additional programs and partnerships to reduce WEEE and optimise recycling. Further research into options for recycling of network infrastructure is also underway.



Energy management

Freshwave plans to align with the ISO 50001 Energy Management System to improve our performance and carbon emissions analysis. Following this standard will help facilitate our 100% renewable electricity target across all operations by 2025, reducing our scope 2 emissions. Freshwave will develop and implement an energy management policy, advance its processes and demonstrate an overall commitment to continual improvement as part of this system.

Declaration and sign-off

This Carbon Reduction Plan has been completed in accordance with PPN 06/21 and the associated guidance and reporting 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 Standard³ and uses the appropriate Government emission conversion factors for greenhouse gas company reporting⁴.

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) Standard⁵.

This Carbon Reduction Plan has been reviewed and signed off by the board of directors (or equivalent management body).

**Signed on behalf of
Freshwave Group⁶.**



Simon Frumkin
CEO

Date: 21 12 2022

³ <https://ghgprotocol.org/corporate-standard>

⁴ <https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>

⁵ <https://ghgprotocol.org/standards/scope-3-standard>

⁶ Freshwave Services Limited is a wholly owned subsidiary of Freshwave Group Limited.

Freshwave

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