



Carbon Reduction Plan

2024





Commitment to achieving net zero

Freshwave is committed to achieving net zero emissions by 2050 or earlier.

In accordance with the UK Government's net zero strategy, Freshwave Group (Freshwave) intends to achieve net zero for its scope 1, 2 and 3 emissions by 2050 or earlier, relative to a 2021 baseline year. These efforts are aligned with the goal of the international, legally binding climate change treaty, the Paris Agreement: to limit global warming to 1.5°C.

Our investors, DigitalBridge, are committed to reach net zero by 2030. We acknowledge this is an ambitious goal. At this stage we do not have a clear pathway to reaching net zero by 2030 but we will continue reviewing and updating our Carbon Reduction Plan annually to identify additional measures that can help us achieve our net zero by 2050 or earlier.



Scope 1

Direct emissions from the combustion of natural gas for heating our offices and the use of fuel by long-term leased company vehicles.

Scope 2

Indirect emissions from the generation of electricity, heating and cooling purchased by us for consumption. These emissions have been calculated using the Greenhouse Gas Protocol's market-based methodology.

Scope 3

Indirect emissions originating from our value chain. As per the UK Government's Technical Standard guidance,¹ this Carbon Reduction Plan (CRP) includes only the following subset of scope 3 emissions:

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

Our emissions reduction targets

We initially committed to achieving carbon neutrality for scope 1 and 2 emissions by 2030. However, we have recently decided to remove this target, as carbon neutrality no longer aligns with our ambitions, the latest climate science, or industry best practice. Moving forward, we will concentrate our efforts on directly reducing our carbon emissions rather than relying on offsetting to achieve carbon neutrality.

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991625/PPN_0621_Technical_standard_for_the_Completion_of_Carbon_Reduction_Plans__2_.pdf



Baseline emissions footprint

Baseline emissions are a record of the greenhouse gases (GHGs) that have been produced in the past and prior to the introduction of any strategies to reduce emissions. Baseline emissions are the reference point against which emission reductions and progress against targets can be measured.

Baseline year: 2021

We calculated our carbon footprint (including scope 1, 2 and 3 emissions) for the first time in 2021, serving as our baseline year. At present we intend to use our 2021 baseline year to track progress against our carbon reduction targets but as additional data becomes available to us we remain committed to reviewing the baseline year and our targets to ensure transparency and accuracy across all our reports.

We have calculated our scope 1, 2 and 3 emissions in line with the Corporate Accounting and Reporting Standard, GHG Protocol which is international best practice in carbon accounting and reporting. We have used consumption data where available to ensure the highest accuracy for our emissions calculations, with estimates derived from industry-standard benchmarks used when not available. Our emissions have been reported under three scopes, as per the GHG Protocol.



Current emissions reporting

The quality and accuracy of our emissions reporting has improved year on year, owing to the greater availability of consumption data associated with our business activities.

In 2022, we expanded reporting to include emissions associated with the energy consumed by leased offices, homeworking and refrigerant leakage from air conditioning units.

In 2023, we further expanded reporting to include emissions associated with the transportation of purchased hardware from our Tier 1 supplier to our own operations. This was the first year we were able to get actual data for this emissions source enabling us to include it in our footprint.

The expanded coverage of our footprint appears to have significantly increased in our emissions relative to 2021. However, by obtaining a more accurate and complete understanding of our emissions, we will be better able to drive year-on-year reductions to meet our net zero target.

	Restated baseline year: 2021 (1 Jan 2022 – 31 Dec 2022)	Previous year: 2022 (1 Jan 2023 – 31 Dec 2023)	Current reporting year: 2023 (1 Jan 2024 – 31 Dec 2024)
EMISSIONS	TOTAL (tCO ₂ e)	TOTAL (tCO ₂ e)	TOTAL (tCO ₂ e)
Scope 1	15.23	25.76	11.44
Scope 2	15.55	79.19	13.71
Scope 3	111.49	175.83	1,176.20
Business travel (excluding hotel stays) ⁽²⁾	39.80	28.22	63.15
Employee commuting	28.97	105.89 ⁽⁴⁾	97.48
Waste generated in operations	28.23	1.34	50.65
Upstream transportation and distribution	14.49	40.38 ⁽⁴⁾	964.85
Downstream transportation and distribution ⁽⁵⁾	0.00 ³	0.00	0.00
Total emissions	142.27⁽³⁾	280.78	1,201.29

² Excludes emissions from hotel stays which are not a requirement of the PPN boundary. Emissions from hotel stays have been included within our overall scope 1-3 footprint.

³ Note our baseline year total has been restated at 142.27 tCO₂e to accurately reflect the sum of the scopes. In our 2023 CRP this figure was incorrectly stated as 152.38 tCO₂e due to a rounding error.

⁴ These two figures were incorrectly copied the wrong way round in our 2023 reduction plan report and have now been corrected in this table.

⁵ We assess all transportation and distribution emissions but are not able to separate upstream and downstream emissions. This report therefore combines all transportation and distribution emissions into the upstream total.



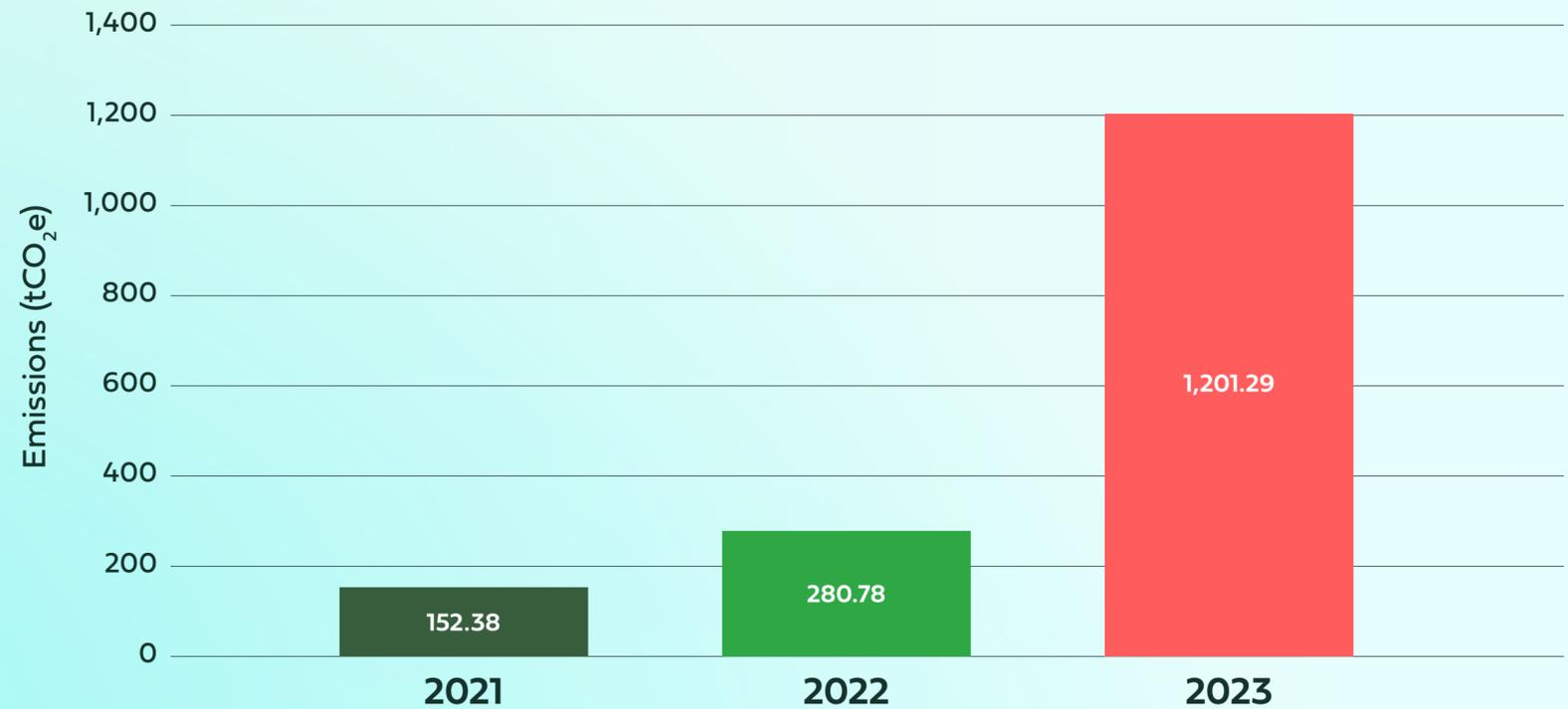
Carbon footprint comparison:

Our emissions within the scope of the PPN have increased by 921 tCO₂e (328%) compared to 2022 and by 1,059 tCO₂e (744%) from the 2021 baseline year.

This increase is driven by including emissions associated with the transportation of purchased hardware from our Tier 1 supplier to own operations. These emissions have now been included due to actual data availability from two key suppliers. In 2023, our own Upstream Transportation and Distribution emissions makeup 81% of emissions within the PPN 06/21 boundary.

Although our emissions have increased significantly, by obtaining a more accurate and complete understanding of our emissions, we will be better able to drive year-on-year reductions to meet our net zero target.

Freshwave's total scope 1, 2 and 3 emissions





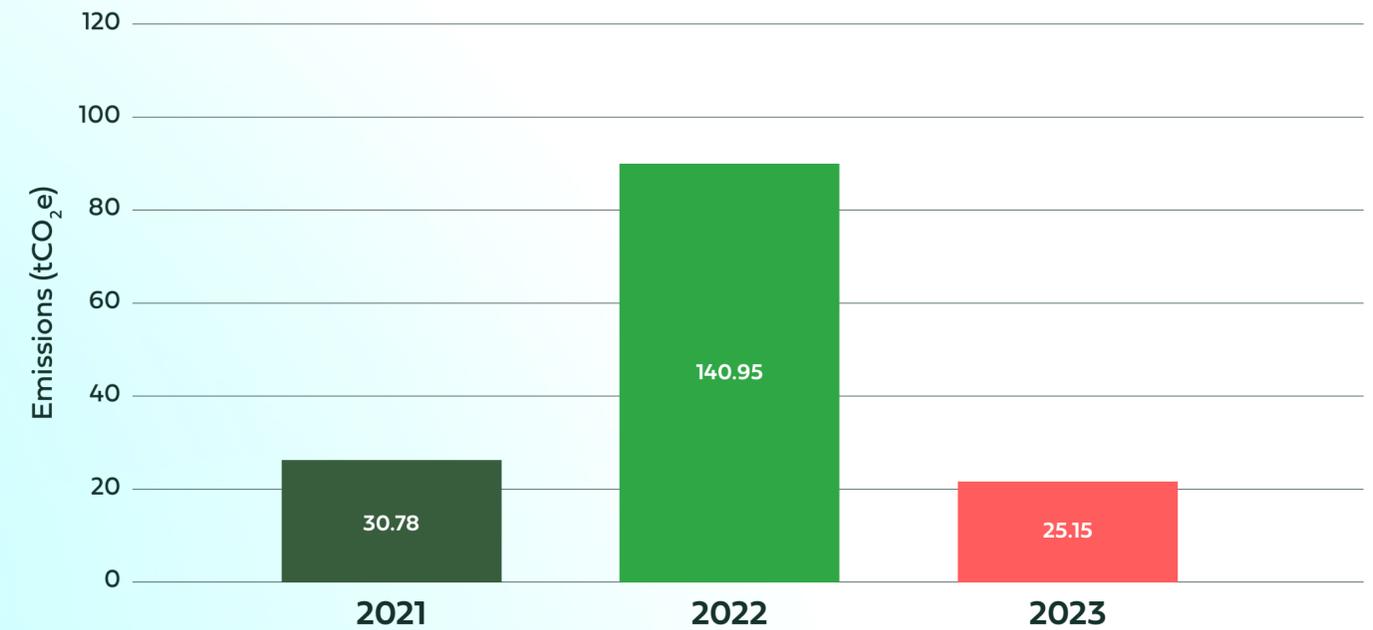
In previous years benchmarks were used to calculate Freshwave’s employee commuting emissions. For 2023 actual data was collected through a survey. This showed that more of Freshwave’s employees take the train to work over driving than was estimated historically, which has lower associated emissions.

Despite this significant increase in total emissions when considering scope 1 and 2, which are within our direct control, our emissions have decreased by 25% and 12% respectively from our 2021 base year. This decrease was driven by us moving out of our East Grinstead office during 2023 which resulted in a decrease in gas and electricity consumption.

Breakdown by scope



Scope 1&2 only year on year





Scope	Category	tCO2e	% of total
Scope 1	Natural gas	0.005	<1%
	Vehicle fuel	11.44	<1%
Scope 2	Electricity	13.71	<1%
Scope 3	11. Use of sold products	6,006.47	36%
	2. Capital Goods	4,496.69	27%
	1. Purchased goods and services	4,274.90	25%
	4. Upstream transportation and distribution	964.85	6%
	13. Downstream leased assets	867.52	5%
	7. Employee commuting	97.48	1%
	6. Business travel (includes hotel stays) ⁶	70.45	<1%
	5. Waste generated in operations	50.65	<1%
	8. Upstream leased assets	30.32	<1%
	3. Upstream emissions from purchased fuel and energy	6.55	<1%
Total		16,891.1	100%

Full 2023 scope 1-3 Footprint

To align with best practice carbon accounting, we also calculate our full scope 3 footprint beyond the categories required by the PPN 06/21. For our full scope 1-3 footprint our most material emissions sources are from the use of our sold products and the goods and services that we purchase.

Alongside our efforts to reduce emissions across the PPN scope 3 categories, we are also concentrating on achieving reductions in these more significant scope 3 sources. We have outlined the key reduction initiatives we are implementing later in this report.⁷

⁶ Includes emissions from hotel stays which are not a requirement of the PPN boundary and are optional in line with the GHG Protocol.

⁷ From page 10 onwards.



Carbon Reduction Plan overview

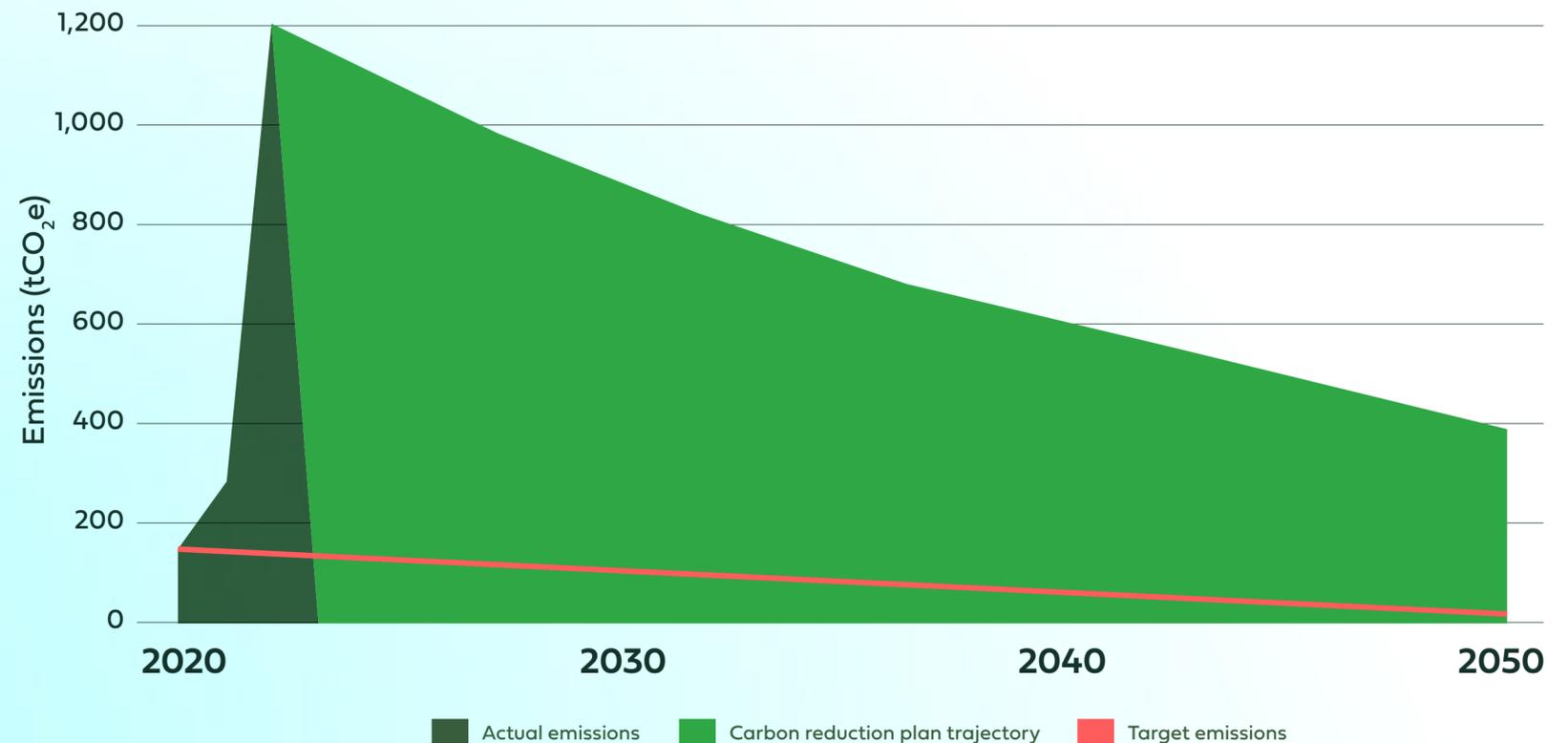
After a detailed review of our carbon footprint, and the reduction levers currently available to our business and suppliers, our Carbon Reduction Plan does not yet take us to net zero.

By implementing the carbon reduction initiatives identified we project that our carbon emissions will decrease by 68% from 2023 to 2050.

However, as our footprint has increased by 744% from the 2021 baseline year due to improved data quality and coverage, emissions are in fact projected to increase 174% by 2050 from the 2021 baseline year.

To ensure we drive emissions to zero, we will annually review and update our Carbon Reduction Plan to identify further levers we can pull to achieve our net zero commitment.

Freshwave's emissions reduction in line with PPN 06/21: Projected vs. Actual





Current carbon reduction initiatives

Improved data quality

The quality and accuracy of our emissions reporting has improved year on year, owing to the greater availability of consumption data associated with business activities. By obtaining a more accurate and complete understanding of our emissions, we will be better able to drive year-on-year reductions to meet our net zero target.





ISO 14001:2015 Environmental Management System (EMS)

We operate an Environmental Management System (EMS) certified to the ISO 14001:2015 international standard. This certification not only demonstrates our commitment to responsible environmental practices but also ensures we align with global best practices in reducing waste, conserving resources, and improving operational efficiency.



EcoVadis accreditation

We were proud to receive the EcoVadis sustainability silver medal for our mast division in 2024. This accreditation⁸ reflects the implementation of operational processes and procedures embedded within the EMS that demonstrate an advanced management system on ethics and environmental initiatives.

⁸ <https://freshwavegroup.com/about-us/legal-and-accreditations/>



Employee engagement

Freshwave has introduced a new ESG Policy, outlining our approach and ambitions across environmental, social, and governance areas. This policy replaces our Carbon Management approach but incorporates our existing Environmental Management Policy.

Building Management Systems (BMS)

Freshwave procured more renewable energy in 2023 as a result of the 2022 relocation to Bloom (Clerkenwell, London), which is energy efficient and sustainably designed. The building has achieved BREEAM 'outstanding' certification and an EPC rating of 'A'.

This has led to emissions reductions as the building is connected to a low carbon and energy-efficient district heating and cooling system supplied by Citigen. This natural gas-fueled system recovers waste heat from turbochargers, engine exhausts, lubricating oil and jacket cooling, and transfers it via heat exchangers to the network, increasing efficiency in the process.

A turn-off policy for lights and other electrical appliances is in place in our older and smaller offices, which also helps to drive emission reductions.

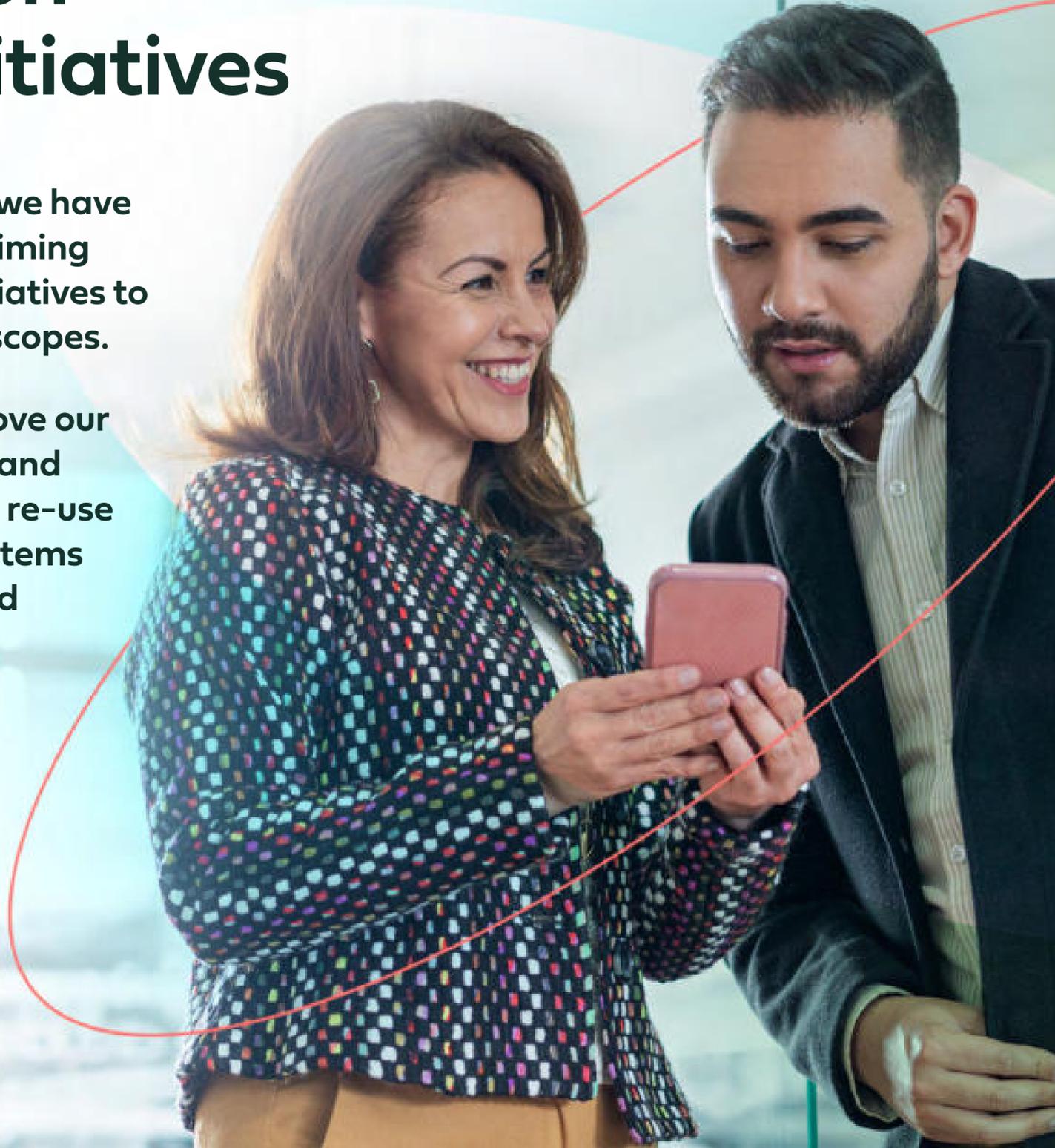
The Bloom office also has mixed recycling and food waste bins.



Future carbon reduction initiatives

In addition to the measures we have already completed we are aiming to implement additional initiatives to reduce emissions across all scopes.

We plan to review and improve our processes to better capture and collect, waste, recycling and re-use data – investing in our IT systems to help us store, measure and report the carbon footprint data of our products more accurately.



Supplier engagement

We endeavor to work closely with our supply chain partners to drive energy efficiency and develop innovative solutions regarding the network infrastructure and the sourcing of materials.

We will introduce an annual Supplier Questionnaire for our Top Tier suppliers, seeking to better understand their carbon reduction ambitions. This will help us identify and drive new reduction initiatives within our scope 3 categories.

During 2025, we will conduct a review of our supply chain. Specifically, exploring opportunities to drive reductions in transportation and distribution emissions. We will engage with our Top Tier suppliers to review and establish the feasibility of transitioning from air to sea freight. Where this is not practical, we will explore using airlines with our suppliers that have set carbon reduction targets.



Waste reduction and recycling programme

Recycling: While our office e-waste is minimal, we are actively reviewing partnerships to enhance our e-waste recycling efforts. One of our key initiatives has been the successful laptop 'buy back' scheme, which has already diverted eight laptops from disposal and raised £800 for AbilityNet, a charity dedicated to helping older and disabled individuals adapt to new technology. This programme not only reduces waste but also supports a worthy cause.



Energy management

We are making significant strides in increasing renewable energy use across our operations, actively reducing our reliance on non-renewable sources where we have direct control. Key achievements include:

- Outdoor small cells: Now powered by 100% renewable electricity.
- City of London: Fully transitioned to 100% renewable energy.

We are also working closely with landlords at our Crawley and Warrington offices to encourage the shift to green, sustainable energy solutions, aiming for a transition to 100% renewable electricity tariffs or the purchase of Renewable Energy Certificates (RECs).



Volunteering

In 2023, we introduced half-day volunteering leave, allowing employees to support causes that matter to them, further enhancing our social responsibility efforts. These initiatives reflect our commitment to reducing our environmental impact while supporting our colleagues and communities.

Hybrid and electric vehicles

To reduce our scope 1 emissions we will be working to transition our company vehicles to hybrid or EVs over the commitment window.

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 CRPs and the GHG Reporting Protocol Corporate Standard.⁹

The appropriate UK Government emission conversion factors for GHG company reporting have been used.¹⁰

Scope 1 and 2 emissions have been reported in accordance with Streamlined Energy and Carbon Reporting (SECR) requirements, and the required subset of scope 3 emissions has been reported in accordance with the published reporting standard for CRPs and the Corporate Value Chain (scope 3) Standard.¹¹

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

**Signed on behalf of
Freshwave Group.**



Simon Frumkin
CEO

Date: 21 12 2024

⁹ <https://ghgprotocol.org/corporate-standard>

¹⁰ <https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>

¹¹ <https://ghgprotocol.org/standards/scope-3-standard>

Freshwave

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