

Nasstar Carbon Reduction Plan 2025

Class 2 - General Internal Use

Carbon Reduction Plan

Supplier name: Nasstar Group Limited

Includes the carbon reduction plan and associated commitments for wholly owned and fully consolidated subsidiaries.



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Version Control

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Version History

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2.0	16/05/2024	DMH	Update for 2023
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0.4	Click or tap to enter a date.		



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 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, each bidding entity, including GCI Network Solutions Ltd., depends on the integrated nature of Group to provide services offered. As the Nasstar Group has grown significant productivity gains have been, and continue to be achieved, through rationalisation and business efficiency improvements. These productivity gains are supporting Nasstar Groups continued improvement in reducing the greenhouse gas intensity associated with the services provided.



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 global operations are conducted from business activities in the UK, and supported (internationally) from an in office in Cyberjaya Selangor (Malaysia). Nasstar's environmental commitments and targets for the business are set at a Group level. This document therefore describes the emissions data relating to Nasstar's UK and international operations.

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 has historically acquired other companies. The acquired entities have appeared 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.

Nasstar's reporting period begins on 1 January and ends on 31 December in line with its financial year. Our baseline year for emissions was set for the financial year 2021 ("FY21"). During the baseline year Nasstar completed the acquisition of the national network from KCOM. The National network's energy consumption and associated emission were significantly larger than GCI's. Since the initial CRP published in 2022 the baseline emissions have therefore been updated to include the acquisition of these assets, and reflecting the use of 3rd party data centres in the baseline year.

This 2025 CRP is based on available data supporting the assessment of actual latest emissions, and updates outcomes from the 2023 report for:

- a) FY 2024 (period 1 January 2024 to 31 December 2024), and
- b) 30 June 2025.

Additionally, we have assessed the near term planned closures and estimated the emissions for the remaining part of 2025.

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).

PPN 06/21 seeks emissions only from organisation UK based operations. However given the nature of Nasstar operations it would not fully reflect the carbon footprint of the Groups UK operations to exclude emissions from operations in Malaysia. For completeness these are calculated to be

- 2023 18.7 t CO₂e / per year



- 2024 18.7 t CO₂e / per year
- 2025 16.0 t CO₂e / per year (estimated)

Details of Scope 1 and Scope 2 emissions

Emissions data is reported in line with the GHG Protocol Corporate Accounting and Reporting Standard under the 'Operational Control' approach. Scope 1 and 2 emissions are calculated using the invoice data and Government conversion factors for company reporting of greenhouse gas emissions.

Scope 1 emissions include gas provided to a number of sites and also gasoil provided to support the provision of back-up generators at several sites. With the exception of the Salford data centre all these sites are all due to be closed by 2027.

Scope 2 emissions are from the electricity directly supplied to administration / office locations and operational locations. We estimate grid carbon intensity factors for 2030 of 150g CO₂e / kWh – based projecting actual data to date, We have not used the government net-zero target of 50g CO₂e / kWh for 2030.

Per the GHG protocol, 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 (4, 5, 6, 7 and 9) as detailed in the technical standard to PPN 06/21, and additional categories to reflect the additional emissions in other Scope 3 categories

Further details on the required Scope 3 categories plus additional category Scope 3 emissions will be included and published in future and subsequent annual reports.

Scope 3 category 1 – "Purchased goods and services"	<p>Allowance has been made for supply of electricity to third-party data centres These are directly interchangeable with emissions due to the operation of directly operated data centres and network sites. For transparency these are included.</p> <p>We have not included emissions due from "cloud computing" related services provided to the Group by MS Azure and AWS. These services replace the directly provided services and those from third party data centres.</p>
Category 3: Fuel- and energy- related activities not included elsewhere.	Upstream transportation and distribution losses to electricity supplied are included. (Re categorised from Category 4 - Upstream transportation & distribution)
Category 5: Waste generated in operations	The quantification of emissions associated with the disposal and treatment of waste generated in operations has been included for the first time in this plan. This is also addressed as part of Nasstar's continuing ISO 14001 programme.



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	Estimated emission are included for employee homeworking and commuting. We include the estimated emissions associated with staff working from home ("employee teleworking") to reflect the impact of the offices closure and downsizing on where the activities of the business are carried out.
Category 9: Downstream transportation & distribution	Nasstar and is a service provider and does not produce or distributes products. There is no scope 1 or scope 2 emissions from transportation providers, distributors, or retailers.



4 Current Emissions Reporting

Reporting Year: FY 2024 (1 st Jan – 31 st Dec 2024)	
EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	42.7 [Gas used in offices]
Scope 2	1,159.0 [Electricity used for operations & in offices]
Scope 3 (Included Sources)	90.9 [Category 6 - Business related travel] 482.3 [Category 1 - Third party data centres] 141.0 [Category 3, upstream Electricity T&D losses – prev incl in Category 4] 0.3 [Category 5, Waste from operations]
Total Emissions	1,917.4

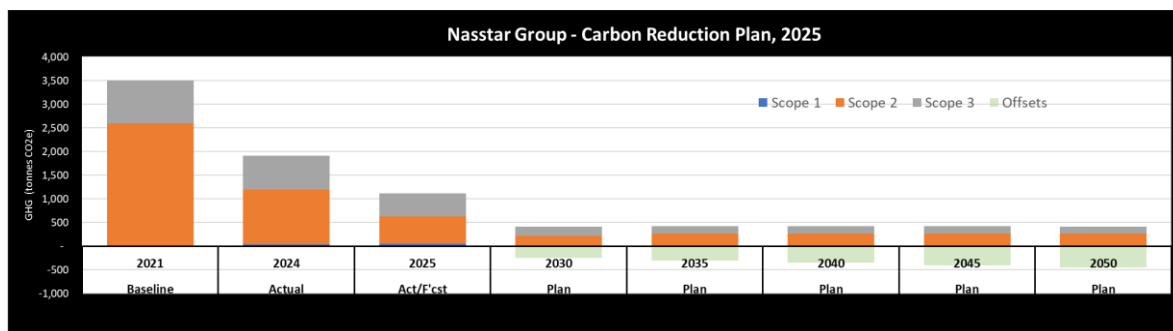


5 Emissions reduction targets

Nasstar aims to achieve Net Zero emissions from UK activities by 2050. Our carbon reduction strategy, driven by a targeted rationalisation plan through 2030, is already delivering significant progress.

We now forecast 2025 in-scope greenhouse gas emissions at 1,120 tCO₂e—down from the previously projected 2,035 tCO₂e—thanks to accelerated site closures and national network rationalisation.

The company's roadmap includes interim targets; after minimising emissions as much as possible, we will use voluntary offsets to reach Net Zero.



Currently planned and forecast total in scope emissions are

- 2025 1,120 tCO₂e
- 2026 615 tCO₂e
- 2027 494 tCO₂e



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 2024.

- Rapid progress has been made in decommissioning of the national business long distance network.
- The Group retained its ISO14001 certification
- Continued energy efficiency measures at the Salford Data Centre, and transfer of network and data activities from directly operated sites from the national network acquisition.
- Carried out an initial assessment of staff homeworking and commute
- We have worked with our third party data centres service providers to. Identify how they can reduce the associated emissions from their activities carried out on our behalf.

Planned Carbon Reduction Initiatives

In the future we will implement further measures that include:

- Further assessment and staff questionnaire to establish a more detailed understanding of staff homeworking and commute.
- Work with service suppliers (including cloud computing service providers) to reduce our Scope 3 emissions,
- Procure renewable electricity for Salford data centres with zero carbon intensity.
- The decommissioning of the national business long distance network and pops is due by the end of 2025.
- Expand our ISO14001 certification to remaining locations.
- Extending educational awareness and training
- Additional LED lighting upgrades
- Further quantification and understanding of value chain environmental impacts.



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 standard and uses the appropriate Government emission conversion factors for greenhouse gas company reporting .

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 24th September 2025.

Signed on behalf of the Nasstar Group Ltd by:

Signed by:

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David Senior, CFO

Date: 24 Sep 2025

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>



8 Document Control

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