Carbon Reduction Plan

Top things to takeaway

Net Zero Commitment

Achieve Net Zero emissions by 2030.

2023 Baseline

A revise baseline year has been adopted to reflect full business scope.

Scope Reporting

Emissions are reported across Scope 1, Scope 2 and Scope 3.

100% Renewable

Data centres and associated offices are powered by renewable electricity.

Offsetting

Year-on-year offsetting strategy is in place, increasing offsetting from 10% to 100% by 2030.

Reduction Initiatives

Initiatives across operations to reduce emissions.

Proprietary Notice

Version control and ownership

Policy owner: Jenny Cooper

Version no	Date	What changed	Changed by	Approver
1.0	27/02/2026	Approved version	Jenny Cooper	Eddie Adams

What is this policy for?

This Carbon Reduction Plan sets out Node4's commitment to reducing greenhouse gas emissions and achieving Net Zero. It establishes a clear framework for measuring and reporting emissions, defining a baseline, and tracking performance over time. The plan outlines the organisation's carbon reduction targets, offsetting approach, and key initiatives across its data centres, offices and wider operations. It also ensures compliance with UK public procurement requirements and recognised standards, while supporting transparency, accountability and continuous improvement in environmental performance.

Who is this policy for?

This policy applies to all areas of Node4's operations and is relevant to employees, management, suppliers, partners and customers. It supports employees in understanding their role in reducing environmental impact, while ensuring senior leadership and operational teams remain accountable for delivering carbon reduction objectives.

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Commitment to Achieving Net Zero

Node4 Limited is committed to achieving Net Zero emissions by 2030 and maintaining this commitment through to 2050.

Node4 Limited remains firmly committed to achieving Net Zero emissions by 2030 and sustaining this commitment through to 2050. This commitment is reflected across our governance, policies and operations, and aligns to current UK public procurement requirements under PPN 006 (formerly PPN 06/21), which continues to require suppliers to publish and annually update a compliant Carbon Reduction Plan.

Over the last 12 months we have strengthened our programme in three ways: operational decarbonisation in our data centres, assurance of low-carbon energy supply, and maturing measurement, verification and reporting in line with evolving best practice and legislation.

Baseline Emissions Footprint

Baseline Year: 2023	
Additional Details relating to the Baseline Emissions calculations.	
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. We have changed our baseline emissions reporting year from 2021 to 2023, as this was the year when all acquisitions were finalised. Therefore, 2023 is the more appropriate baseline to show environmental performance and base our offsetting strategies on, as it now reflects the whole business operations and all office locations. The scope of our carbon reduction plan encompasses all of our business operations, covering our four data centres (two in Derby, one in Northampton, and one in Wakefield), the offices attached to these data centres, as well as our offices in Stafford and Newbury. It also includes reporting for remote workers, reflecting the business operations of a 1,100-employee company.	
Baseline year emissions:	
Emissions	**TOTAL (tCO2e)**
Scope 1	Scope 1 emissions are direct greenhouse gas emissions that occur from sources that are controlled or owned by the reporting organisation. e.g., emissions associated with fuel combustion in boilers, furnaces, vehicles.

	Total Scope 1: 78.66 tonnes CO2e • Diesel for the generators – 56.12 tonnes CO2e (last delivery September 2023) • Fleet vehicles (diesel and petrol) – 22.54 tonnes CO2e Node4 Limited confirms that all direct (Scope 1) emissions are accurately reported in accordance with the GHG Protocol Corporate Accounting and Reporting Standard and SECR requirements.
Scope 2	Scope 2 emissions are indirect greenhouse gas emissions associated with the purchase of electricity, steam, heat, or cooling. They are accounted for by the reporting organisation as they are a result of the organisation's energy use. Node4's electricity usage at data centres, offices, and for electric fleet vehicles is the only factor that falls into Scope 2. However, Node4 procures 100% renewable energy at our data centres in Northampton, Wakefield, Derby, and at our Stafford office, which eliminates our emissions associated with electricity usage. Emissions related to electricity transmission and distribution are included in Scope 3. The only office not currently on a renewable energy tariff is our Newbury office. **Total Scope 2: 29.36 tonnes CO2e** • Electricity usage at Data Centres (with attached offices) and Stafford office – 0 tonnes • Electricity usage at Newbury office – 3.54 tonnes CO2e • Electric / hybrid vehicles – 25.82 tonnes CO2e Node4 Limited confirms that all indirect (Scope 2) emissions are accurately reported in accordance with the GHG Protocol Corporate Accounting and Reporting Standard and SECR requirements.
Scope 3	Scope 3 emissions are indirect greenhouse gas emissions that occur as a result of activities both upstream and downstream of the organisation's operations. They are not directly controlled by the organisation but are generated by sources such as business travel, employee commuting, waste disposal, and the production of purchased materials. These emissions are accounted for by the reporting organisation as they represent a significant component of the organisation's overall carbon footprint. **Total Scope 3: 1711.8 tonnes CO2e** Waste (black bag, wood, and mixed) – 91.66 tonnes CO2e Hotel stays – 18.82 tonnes CO2e

	Business Travel (land and air) – 295.91 tonnes CO2e Water Supply – 3.70 tonnes CO2e Employee commuting – 365.99 tonnes CO2e Gas usage (homeworkers) – 402.67 tonnes CO2e Electricity usage (homeworkers) – 33.10 tonnes CO2e Electricity T&D (data centres with attached offices, Stafford and Newbury) – 495.22 tonnes CO2e Oil (Newbury) – 1.27 tonnes CO2e Hiring of other office locations – 0.21 tonnes CO2e Company events – 3.25 tonnes CO2e Node4 Limited confirms that all required categories of Scope 3 emissions, including waste generated in operations, business travel, and employee commuting are comprehensively covered and accurately reported.
Total emissions	**1819.82 tonnes CO2e**

Current Emissions Reporting

Reporting year: 2025	
Additional Details relating to the current emissions reporting:	
Node4 have calculated and reported our emissions in line with the GHG Protocol Corporate Accounting and Reporting Standard (revised edition) and emission factors from the UK Government's GHG Conversion Factors for Company Reporting. SECR methodology and the CO2 calculations have been verified by an ISO 50001 UKAS-accredited auditor and an ESOS-qualified energy consultant. Usage Data has been taken from energy supplier billing information.	
Baseline year emissions:	
Emissions	**TOTAL (tCO2e)**
Scope 1	Scope 1 emissions are direct greenhouse gas emissions that occur from sources that are controlled or owned by the reporting organisation. e.g.,

	emissions associated with fuel combustion in boilers, furnaces, vehicles. **Total Scope 1: 44.23 tonnes CO2e** • Diesel for the generators – 0 tonnes CO2e (last delivery September 2023) • Fleet vehicles (diesel and petrol) – 44.23 tonnes CO2e Node4 Limited confirms that all direct (Scope 1) emissions are accurately reported in accordance with the GHG Protocol Corporate Accounting and Reporting Standard and SECR requirements.
Scope 2	Scope 2 emissions are indirect greenhouse gas emissions associated with the purchase of electricity, steam, heat, or cooling. They are accounted for by the reporting organisation as they are a result of the organisation's energy use. Node4's electricity usage at data centres, offices, and for electric fleet vehicles is the only factor that falls into Scope 2. However, Node4 procures 100% renewable energy at our data centres in Northampton, Wakefield, Derby, and at our Stafford office, which eliminates our emissions associated with electricity usage. Emissions related to electricity transmission and distribution are included in Scope 3. The only office not currently on a renewable energy tariff is our Newbury office. **Total Scope 2: 35.21 tonnes CO2e** • Electricity usage at Data Centres (with attached offices) and Stafford office – 0 tonnes • Electricity usage at Newbury office – 12.5 tonnes CO2e • Electric / hybrid vehicles – 22.69 tonnes CO2e Node4 Limited confirms that all indirect (Scope 2) emissions are accurately reported in accordance with the GHG Protocol Corporate Accounting and Reporting Standard and SECR requirements.
Scope 3	Scope 3 emissions are indirect greenhouse gas emissions that occur as a result of activities both upstream and downstream of the organisation's operations. They are not directly controlled by the organisation but are generated by sources such as business travel, employee commuting, waste disposal, and the production of purchased materials. These emissions are accounted for by the reporting organisation as they represent a significant component of the organisation's overall carbon footprint.

	Total Scope 3: 2015.13 tonnes CO2e • Waste (black bag, wood, and mixed) – 115.23 tonnes CO2e • Hotel stays – 27.59 tonnes CO2e • Business Travel (land and air) – 556.75 tonnes CO2e • Water Supply – 1.33 tonnes CO2e • Employee commuting – 503.22 tonnes CO2e • Gas usage (homeworkers) – 258.76 tonnes CO2e • Electricity usage (homeworkers) – 97.83 tonnes CO2e • Electricity T&D (data centres with attached offices, Stafford and Newbury) – 429.68 tonnes CO2e • Oil (Newbury) – 23.44 tonnes CO2e Node4 Limited confirms that all required categories of Scope 3 emissions, including waste generated in operations, business travel, and employee commuting are comprehensively covered and accurately reported.
Total emissions	**2094.56tonnes CO2e**

Emissions Reductions Targets

In order to continue our progress to achieving Net Zero by 2030, we have adopted the following carbon reduction targets to facilitate a gradual decrease in Node4's emissions. Our aim is to reduce emissions gradually by increasing the percentage of emissions offset each year, starting from the 2023 baseline.

Based on the 2023 baseline of 1819.82 tonnes of CO2e, here is the year-on-year reduction plan for offsetting emissions from 2026 to 2030:

Year	Estimated Emissions (tCO_2e)	% Offset	Offsets Purchased (tCO_2e)	Net Emissions
2023	1,819.82	10%	182	1,637.84
2024	2,081.88	15%	312	1,770.00
2025	2,095	25%	524	1,571
2026	2,000	40%	800	1,200

2027	2,000	55%	1100	877
2028	2,000	70%	1400	555
2029	2,000	85%	1700	262
2030	2,000	100%	2000	0 (Net Zero)

This plan reflects a structured, year-on-year increase in the proportion of emissions we offset, rising from 10% in 2023 to 100% by 2030. The projections assume a broadly stable emissions profile over this period, although we recognise that actual emissions may vary due to operational changes, business growth, and improvements in energy efficiency.

We will closely monitor our emissions each year to ensure we remain on track to achieve carbon neutrality by 2030. Where actual emissions exceed the estimated levels used in this plan, we commit to purchasing additional offsets as required. This ensures that we continue to meet the annual offsetting percentages set out in our roadmap and maintain progress toward our Net Zero target.

By taking this approach, we can remain flexible to real-world changes while upholding our commitment to achieving carbon neutrality by 2030, regardless of fluctuations in our emissions profile.

Carbon Reduction Projects in 2025

Completed Carbon Reduction Projects and Initiatives

Renewable Energy and Estate Optimisation

Our commitment to reducing our environmental impact continued throughout 2025, supported by the use of fixed renewable energy across all data centres, attached offices and our Stafford locations until March 2026. This ensures that electricity consumed across these sites contributes zero emissions, with only transmission and distribution losses remaining in our reporting.

During the year, we also closed one of our Stafford branches. This decision reduced unnecessary energy use by ensuring that we only occupy and heat spaces that are actively utilised, supporting a more efficient and environmentally responsible estate.

Data Centre Efficiency Improvements

Data Centre 2 (Derby)

- Completed the full replacement of the DC2 UPS system, removing older, inefficient units and installing new high-efficiency models.
- This upgrade has improved power conversion efficiency and reduced energy losses across the site.
- Merged the plant-room cooling system with the Hall 2 cooling system, enabling three plant-room air-conditioning units to be switched off while maintaining the correct environmental conditions.

- Installed cold aisle containment in Hall 2, improving airflow management and reducing the overall cooling requirement.

Data Centre 3 (Leeds)

- Implemented a structured programme of setpoint increases across multiple data halls, raising CRAH and chiller temperatures in controlled increments to maximise free-cooling hours.
- Replaced Chiller 4 (January 2026, building on the 2025 programme), further improving cooling efficiency and reducing reliance on mechanical cooling.
- Reduced minimum fan speeds across several cooling systems to lower power consumption while maintaining operational stability.
- Continued to reduce plant-room DX cooling usage through improved monitoring, revised thresholds, and greater use of eco-coolers.

Data Centre 4 (Northampton)

- Completed Phase 1 of the DC4 cooling redesign, including the installation of two new chillers with increased free-cooling capacity and a shift to a more environmentally friendly refrigerant.
- Separated Hall 1 and Hall 2 cooling into four individual chilled-water circuits, improving resilience, control, and efficiency.
- Powered down four process pumps as a result of the new configuration, reducing energy usage without compromising uptime.
- Further refined temperature setpoints and fan speeds throughout the year to optimise cooling performance and support sustained reductions in energy consumption.
- Achieved a substantial reduction in plant-room DX usage despite a warm summer, reflecting improved environmental control and system tuning.

As a result of these improvements, our data centres are now operating more efficiently, using less power and generating fewer emissions. The continued optimisation of heat exchange and cooling performance also strengthens resilience and reduces operational risk across our estate. Regular monitoring, proactive maintenance, and targeted infrastructure investment remain central to our approach, ensuring that our facilities remain energy-efficient, cost-effective, and environmentally responsible.

ESOS Compliance

In November 2025, we completed our ESOS Action Plan update, capturing the operational improvements delivered in Data Centre 2 and the resulting reduction in energy consumption achieved between 6 December 2024 and 5 December 2025. This forms part of our commitment to transparency and robust energy management across all sites.

Carbon Offsetting and Employee Engagement

In 2025, we completed our first carbon offset through our approved offsetting partner, Carbon Neutral Group, covering 10% of our 2023 baseline emissions by offsetting 180 tonnes of CO_2e. To encourage employee engagement and broaden participation in our

sustainability initiatives, staff were invited to help select the project to receive our first year of funding.

Three eligible projects were presented, and employees were encouraged to review the environmental and social benefits of each before voting. The Fundão-Santa Clara Energetic Complex Project (FSCECP) in Brazil received the highest number of votes and was selected as our 2025 offset project. This hydropower initiative generates zero-carbon electricity while supporting the local community through job creation—over 1,500 roles during construction and ongoing specialist positions for operation and maintenance. It also contributes to regional technical development through infrastructure and skills investment.

This employee-led selection process enhanced awareness, involvement and ownership of our carbon-reduction efforts across the organisation and marks a meaningful start to our long-term offsetting strategy.

Future Carbon Reduction Projects

Looking ahead, we will continue to strengthen our environmental performance through focused operational improvements, investment in efficient technology, and sustained engagement across the organisation. While our data centres remain the largest contributors to our overall emissions, business travel represents the next most significant source. To help control this, we are introducing a new travel and expense solution that will encourage public transport use, require line manager approval, prompt more conscious decision-making, and provide improved reporting to support better oversight and reduction efforts.

Our broader carbon reduction plans prioritise improving the efficiency of our data centres, enhancing the sustainability of our office estate, increasing employee awareness, and expanding our contribution to high-quality environmental and social value initiatives through credible offset projects. Collectively, these actions form a core part of our long-term strategy to achieve Net Zero by 2030.

Data Centre Infrastructure and Efficiency Improvements

Our data centres remain the largest contributors to our overall energy usage, and therefore the main focus of our future operational improvements.

Planned works across the estate include the following:

Data Centre 1 (Derby)

- Comple the closure of the legacy Hall 1, which is already underway, to reduce unnecessary cooling and power consumption in low load areas.
- Replacement of the hall 2 DX air conditioning units with a modern, energy efficient cooling system that offers free cooling capability.
- Continued investigation into the feasibility of installing solar panels, subject to electrical compatibility checks with the main panel board.

Data Centre 2 (Derby)

- Replacement of the legacy DX air-conditioning units with a modern, energy-efficient cooling system that offers free-cooling capability.

Data Centre 3 (Leeds)

- Replacement of Chiller 4 with a new, more efficient unit to complement the recent cooling upgrades already completed.
- Continued monitoring of all cooling infrastructure and setpoints to ensure they are running as efficiently as possible and maximising free-cooling usage.
- Investigation of evaporative free-cooling (EFC) technology in the plant-room area to reduce DX usage.
- Investigation into installing solar panels on the roof to support on-site renewable generation.

Data Centre 4 (Northampton)

- Complete Phase 2 of the cooling upgrade project for Halls 1 and 2, including replacing the final two older chillers with modern, high-efficiency units.
- Investigation into the benefits of operating the evaporative free-cooling system on water for extended periods, increasing the proportion of low-energy cooling hours.
- Further analysis of CRAH and chiller fan speeds to identify opportunities for continued energy savings.
- Investigation of evaporative free-cooling (EFC) technology in the plant-room area to reduce DX usage.
- Continued investigation into solar panel installation options.

Continued Areas of Monitoring and Optimisation within the Data Centres

We will maintain close oversight of cooling performance and environmental optimisation across all data centres. Key areas of focus will include:

- Strengthening airflow management through blanking controls, Delta-T monitoring, and routine checks on subfloor and overhead obstructions.
- Maintaining regular filter replacement schedules and ensuring fan speeds are correctly balanced to prevent negative pressure zones.
- Continued auditing of customer and internal equipment orientation to ensure correct airflow paths and avoid cooling inefficiencies.
- Maximising free-cooling by optimising water- and air-side setpoints while maintaining ASHRAE-compliant conditions.
- Assessing further changes to AC control sequencing, exploring technological upgrades, and seeking capital approval for new indirect evaporative cooling units at DC3 and DC4.

Energy Tariff Management and Renewable Electricity

We will continue to secure fixed renewable electricity tariffs for our data centres and office locations, ensuring price stability
while maintaining zero-emission, REGO-backed electricity. This remains a

critical component of our carbon reduction strategy and supports accurate forecasting of Scope 2 emissions.

Employee Training and Environmental Awareness

To embed sustainability further across the organisation, we will enhance our environmental and energy-related training. This will include refresher training for all employees and dedicated onboarding modules for new starters. The updated training will focus on energy awareness, environmental responsibilities, and how individual behaviours contribute to our overall carbon footprint. Strengthening this knowledge base will support a more environmentally conscious culture across the whole business.

Office Energy Improvements

We will continue to improve the energy efficiency of our office estate by reviewing lighting, heating and ventilation, increasing energy monitoring, and ensuring unused spaces are not heated or powered unnecessarily. These actions sit alongside our broader commitment to ensure that all workspace is utilised efficiently and responsibly.

Solar Feasibility Assessments

We will assess the feasibility of installing solar panels at suitable data centre and office sites. This review will consider structural constraints, energy generation potential and long term commercial viability. Solar installations would support our shift towards onsite renewable generation and reduce our reliance on grid electricity.

Carbon Offsetting and Global Project Involvement

We will continue offsetting emissions in accordance with our Carbon Reduction Plan, gradually increasing the proportion of emissions offset each year in line with our Net Zero target. Staff engagement will remain central to this process; we will continue involving employees in project selection to ensure that our offset initiatives reflect the values of our organisation.

We will explore global offset projects that deliver both environmental and social benefits, prioritising those that support community resilience, biodiversity and sustainable development.

Corporate Forest Initiative

As part of our long-term approach to environmental regeneration, we plan to establish our own corporate forest. This initiative will provide meaningful, measurable benefits, including:

- Tree and crop planting
- Job creation
- Employment opportunities for women

- Improved soil quality and long-term land restoration
- Job security for local communities
- Increased crop diversity
- Improved yields and enhanced harvests

This project will contribute to carbon sequestration while supporting sustainable agriculture, community development and enhanced biodiversity.

Annual Review and Update

Node4 Limited is committed to conducting an annual review and update of this Carbon Reduction Plan. This review will reflect our progress in reducing emissions and incorporate any changes in our organisational structure, operations, or external factors. By regularly updating our plan, we ensure that our strategies remain effective and aligned with our commitment to achieving Net Zero emissions.

Declaration and Sign Off

This Carbon Reduction Plan has been completed in accordance with PPN 06/21 and 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 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.

This Carbon Reduction Plan has been reviewed and signed off by:

SIGNATURE: 

NAME: Mark Grafton

ROLE: Chief Financial Officer

APPROVED DATE: 5th March 2026