



Electricity Transmission

REPORTING CRITERIA AND BASIS OF PREPARATION

Annual Environmental Report 2024

nationalgrid

Introduction

This document explains the basis of preparation for key environmental sustainability performance metrics and disclosures reported within the 2024 Annual Environmental Report ('the report').

Principles of reporting

In the preparation of the report, we have sought to ensure that:

- The reported data is meaningful and serves the needs of the report's users.
- The reported data accurately reflects our FY24 performance and is consistent with the definitions, scope and boundaries stipulated within this methodology statement.
- The assumptions made around our calculation and measurement methods are clear.

The report is a transparent summary of our performance and enables the report's users to have confidence in the integrity of our data and the information contained within the report.

The material exclusions of a dataset are clearly stated and explained.

Our reporting is mostly aligned with the Responsible Business Report however some differences may occur due to individual consolidation timelines.

Assurance

All metrics reported within National Grid Electricity Transmission's (NGET) Annual Environmental Report are subject to our internal quality control review and approval processes. Our Scope 1 & 2 emissions were subject to external independent limited assurance, through our Group Level Reporting, carried out by PwC: [National Grid PwC limited assurance opinion - 31 March 2024.docx](#)

Reporting boundaries

Our report provides data and information for the period 1 April 2023 to 31 March 2024 across our NGET business.

Collaboration to ensure consistency in reporting

We are collaborating with the Scottish Transmission Owners (SPEN and SSEN) to ensure consistency in reporting methodology and reported units within the electricity transmission sector. As we develop through RIIO-T2, we expect some cross-sector consistency to be developed.

Reporting specifics and methodologies

1. Net zero carbon emissions

1.1 Achieve 34% reduction in scope 1 and 2 emissions by 2026.

Baseline: 298,918tCO₂e (FY19)

Metric: % of tCO₂e

Scope: Our scope 1 emissions are our direct emissions from leakage of insulating gases and operational travel (this includes company cars and the commercial and aviation fleet). Private and hire cars are excluded, as we include these in our scope 3 emissions inventory

Scope 2 emissions include indirect emissions associated with purchased energy and electricity transmission losses. This includes the electric vehicle (EV) charge card data that accounts for the energy used in charging EV Fleet Vehicles. Scope 2 emissions are reported on a market basis and location basis. We exclude emissions from transmission losses in our 2026 target as these are largely out of our control. Including emissions from transmission losses would mean that our emissions figures would be 4.5x greater.

Calculation methodology: We have an established greenhouse-gas-emissions inventory quality management system based on the Greenhouse Gas Protocol. Emissions factors are derived from the Department for Energy Security and Net Zero (DESNZ) for the reporting year. These factors are used to convert activity data (i.e. kWh) into tonnes of CO₂e. Annual scope 1 and 2 emissions data (excluding transmission losses) are added together to arrive at the total tonnes of CO₂e

Assumptions: In some cases, such as energy use and operational travel, GHG emissions do not directly relate to NGET as a business unit. If this is so, we use an appropriate metric to allocate an estimated proportion of GHG emissions to individual business units. For FY24 we have used an allocation factor of 28.14%. For substation energy use, we have included data for our metered estate.

Additional notes: Although significant efforts have been made to meter all operational estates, there are still power draws that may be unmetered and therefore may not be covered.

Data maturity RAG: ●

1.2 Reduce SF₆ emissions from our operations by 50% by 2030.

Baseline: 11,935 kilograms (kg) of SF₆ leakage (FY19)

Metric: SF₆ leakage (kg)

Scope: The scope includes NGET SF₆ leakages from NGET Transmission sites where the 'actual reason code' for the top-up is filtered by 'equipment / zone leaks to atmosphere'. We also include the SF₆ proportion of blended SF₆ gases such as SF₆/N₂ into the scope of our reporting.

Calculation methodology: SF₆ readings are taken from the gas flow meters and the top-up masses recorded on to our systems. Top-ups over the 12-month reporting period are summed to get the annual SF₆ emissions for the UK. This is then converted to tCO₂e using the IPCC AR5 Global Warming Potential (GWP) factor: 1kg SF₆ = 23,500kg CO₂e.

Assumptions: Appropriate action is taken to ensure the calculated figures represent SF₆ leakage only. For example, if SF₆ is added to fill a new piece of

equipment, this will appear in our SF₆ inventories but will not be included within calculations for SF₆ lost.

Data maturity RAG: ●

1.3 Purchase 100% own use electricity from renewables.

Baseline: NA

Metric: % of power attributable to renewable generation assets.

Scope: The scope covers NGET's electricity supply across the core and operational estate. It covers both metered and unmetered sites.

Calculation methodology: (Amount of green energy procured during the financial year/Total amount of energy consumed during the financial year)*100%

Assumptions: NA

Additional notes: We are procuring 100% green power from Moray East offshore wind farm through our energy supplier since October 2023.

In addition, we are tendering for a long-term Tier 1 power purchase agreement with additionality (new renewable generation being built).

Data maturity RAG: NA

1.4 Create a substation energy efficiency programme.

Baseline: NA

Metric: Programme with annual milestones established.

Scope: The scope includes NGET's estate of operational high voltage electricity substations. Energy efficiency refers to all elements of the

electricity substations, i.e. operational usage, site lighting, and “domestic” use in site accommodation (office space, equipment rooms such as relay and telecoms and facilities such as mess rooms and changing areas etc).

Calculation methodology: The energy efficiency project main drivers are to reduce energy, (which will in turn reduce carbon) and reduce our energy bills. Energy efficiency survey audits have been undertaken to identify energy saving opportunities; technologies such as upgrading lighting and control systems, upgrading heating systems, building fabrics and Solar PV are the common opportunities. Surveys at approximately 130 substation building sites have been completed in total. An energy efficiency programme is being created in RIIO T2, to install energy saving technologies to enable the drivers to be met in RIIO T3 period and provide energy targets for substation buildings.

Assumptions: NA

Additional notes: In FY24 we reported on sites having undertaken energy audits. This will inform the development of a substation energy efficiency programme.

Data maturity RAG: ●

1.5 Focus on an efficiency-first approach to decrease the carbon emissions from our office energy use by 20%.

Baseline: 1,982.1 tCO₂e (based on 7,885,425 43MWh) (FY20 baseline)

Metric: % decrease in carbon emissions from office energy use.

Scope: The scope includes electricity, gas, diesel, LPG and fuel oil use. Energy used for EV charging is deducted from office energy use.

The following sites are in scope:

- 47% of National Grid House (based on NGET's share of building occupancy)
- 100% of Eakring Training Centre
- 100% of Didcot

The site list is updated annually to reflect the sites occupied within the reporting period.

Calculation methodology: % reduction in carbon emission from energy use = annual consumption of meter reads and invoices * DESNZ carbon conversion factors/ baseline (tCO₂e) x100

Assumptions: Actual supplier invoices and manual meter reads are used to calculate energy use. If these methods are not available, estimated consumption data is backed by degree day regression.

Additional Notes: Solar self-generation is reported in the energy consumption total but considered zero emissions energy in the footprint report.

The NGET allocation percentage for National Grid House is recalculated annually, to reflect occupancy changes within the building.

Data maturity RAG: ●

1.6 Replace 60% of our fleet with Zero Emissions Vehicles (ZEVs).

Baseline: 836 vehicles

Metric: % of light-duty vehicles replaced with ZEVs

Scope: The scope covers NGET's light commercial fleet vehicles only (i.e. a vehicle up to 3500kg in weight). Heavy goods vehicles and company cars are excluded from the metric.

Calculation methodology: ZEVs are derived from NGET's fleet list. The fleet list must be filtered by 'Vehicle Group Code' to remove any plant vehicles, 'O Licence Vehicle' to remove heavy good vehicles, and 'Fuel Type' to view the correct number of ZEVs in NGET's fleet.

% of vehicles replaced is calculated using = (# of vehicles replaced/ baseline) X100

Assumptions: The scope includes only vehicles that enter into operation.

Data maturity RAG: ●

1.7 Reduce carbon emissions for our business transport by 10% on 2013-2020 averages.

Baseline: 3,120tCO₂e

Metric: % reduction in tCO₂e

Scope: NGET's business travel metric covers:

- Personal car expensed mileage
- Company car expensed mileage
- Hire car mileage
- Air travel
- Rail travel

Calculation methodology: NGET's % reduction in business travel is calculated using tCO₂e = (Mileage x emission factor)/ baseline) x 100

The emissions factors used are derived from FY24 DESNZ, based on vehicle size (Small, medium, large or average) and fuel type (Diesel, Petrol, Hybrid, CNG, LPG, Unknown, Plug in Hybrid Electric Vehicle or Battery Electric Vehicle). The emissions factors for air travel are derived from DESNZ based on sector, cabin class and date. For rail travel, emissions are calculated using the DESNZ 'National Rail' emissions factor.

In some cases, business travel does not directly align to a business unit, or a service is shared between multiple business units. In these cases, it is necessary to use an apportionment allocation factor to allocate NGET an estimated portion of GHG emissions. This apportionment factor will come from RRP Business Support table.

Where available, employee IDs are mapped against the latest SAP employee database to provide the most accurate business unit split. In some cases, business travel does not directly align to a business unit, or a service is shared between multiple business units. In these cases, it is necessary to use an apportionment allocation factor to allocate NGET an estimated portion of GHG emissions. For FY24, an allocation factor of 28.14% was used.

Assumptions: The data is based on the latest SAP Employee ID report (as provided by Group Safety, Health and Environment).

Data maturity RAG: ●

1.8 Deliver carbon neutral construction by 2026.

Baseline: NA

Metric: The balance of GHG emissions and removals including compensation associated with NGET construction activities will be carbon neutral by 2025/2026.

Scope: The target period is for any emissions associated with NGET construction activities completed in FY25/26, and where building started during the RIIO-T2¹ price control period (April 2021-March 2026). This will incorporate GHG emissions associated with lifecycle stages A1-5 (pre-

construction to construction) as described in PAS 2080.

Calculation methodology: To achieve this target carbon reduction must be considered and achieved throughout our project's lifecycles. Evidence will be required that emissions have been minimised during our Network Development Process (NDP). At optioneering and detailed design the Carbon Asset Database (CAD) database is now integrated into our EHUBs estimating tools - the Cost Book and Work Breakdown Structure. This automatically generates a capital carbon footprint for all schemes during optioneering and detailed design at the same time as a cost estimate is generated. This bespoke dataset provides carbon factors for most key materials and equipment used within NGET construction. It has been developed over a number of years using primary data from a range of different sources including SimaPro data, ICE v3, CESMM4 and from equipment suppliers.

At delivery, for schemes where there is scope for further carbon reduction, contractors are asked to complete our Carbon Interface Tool (CIT) during tender or post contract award. The CIT is an excel-based, in-house tool that allows us to understand the carbon footprint of schemes at delivery in more detail. Contractors shall provide us with a baseline carbon footprint and an as built carbon footprint. We measure a scheme's carbon reduction performance between their baseline carbon footprint and as-built carbon footprint (both absolute carbon measured in tCO₂e) to report carbon emissions reduction.

As an interim basis, we use a carbon intensity metric (tCO₂e/£m) to measure interim performance in capital carbon at a portfolio level. We measure this for new construction projects that have been

completed in the reporting year. However, carbon intensity performance is heavily impacted by the type of projects in our workbook and thus may heavily fluctuate year-on-year. Recent increases in inflation are affecting the tCO₂e/£m metric so in FY24 we will be reviewing other potential intensity metrics such as tCO₂e/km.

In FY24, we took the following steps to obtain a carbon intensity figure:

1. Determining projects in scope: P6 financial reporting of completed projects within the year, that were contracted after the start of the T2 period.
2. Project carbon emissions: project -specific data:: Carbon Interface Tool (CIT) calculation built up to calculate a project specific carbon footprint Assurance is carried out on each project to ensure the CIT submission is of a reasonable quality.
3. Project carbon emissions: Where project-specific data is not available then we are using:
 - Projections: of project carbon made in RIIO T1.

Assumptions: To achieve net-zero carbon construction by 2025/26 by implementing PAS 2080 (Carbon Management in Infrastructure) supported by a carbon compensation approach that we externally consulted on in FY24. These funds are only provided if we can demonstrate to Ofgem that the principles of PAS 2080 have been adhered to and they are allocated on a "use-it or lose-it" basis.

Data maturity RAG: ●

¹ RIIO-T2 is the price control for the high voltage electricity transmission networks and high-pressure gas transmission

networks which transmit energy across Britain from where it is generated. The price control runs for five years, from 2021-2026.

1.9 Encourage 75% of National Grid's top 250 suppliers (by category/spend) to have carbon reduction targets and for 80% (by emissions) to have science-based targets.

Baseline: 67% (FY21)

Metric: % of suppliers with carbon reduction targets

Scope: The top 250 supplier target listing is determined by total spend data and carbon intensity by category. There are a number of exclusions as described below.

Carbon reduction targets are targets to reduce carbon emissions as defined by the Carbon Disclosure Project (CDP).

CDP provides an annual analytics and a snapshot report with data taken from the supplier submissions in the CDP Online Reporting System.

Calculation methodology: The CDP supply chain program – the method to collect supplier data – starts in April and runs until the end of July. This is followed by engagement with the suppliers to ensure the CDP online reporting system data submission/questionnaire is completed in a timely manner. The calculation of % of suppliers with targets is derived from the following = $(\text{suppliers with carbon targets in review period} / 250 \text{ suppliers}) \times 100$. Supplier data used to measure NGET's FY23/24 performance will be based on suppliers' data from the previous year.

Assumptions: NA

Data maturity RAG: ●

1.10 Install 1430 ac EV charging bays and 40 dc EV charges on ET operational estate in support of the Commercial Fleet electrification programme.

Baseline: 1430 ac EV charging bays and 40 dc EV chargers.

Metric: Number of chargers required to support the commercial light-duty vehicles replaced with ZEVs.

Scope: The scope covers NGET's light commercial fleet vehicles only (i.e. a vehicle up to 3500kg in weight). Heavy goods vehicles and company cars are excluded from the metric.

Calculation methodology: NA

Assumptions: NA

Data maturity RAG: ●

1.11 All band A-C company cars to be zero emission vehicles (ZEVs).

Baseline: 236 company cars

Metric: % of company vehicles band C and above

Scope: All pure EV company cars for the business affiliate of band A-C which are replaced in this year's replacement cycle.

Calculation methodology: The calculation of % of band A-C with EVs is derived from the following = $(\text{number of EVs as company} / \text{total company cars}) \times 100$

Assumptions: Based on the assumption there are no industry material shortages as previous seen using the semi-conductors as the example. We can assume by 2025 all vehicles band C – A will be pure EV's.

Data maturity RAG: ●

1.12 Phase out the use of diesel generators where commercially available.

Baseline: Baseline data to be reported in FY25.

Metric: % of diesel used from baseline year.

Scope: Use of diesel in our construction projects as well as diesel used in our operational sites for the purposes of black start.

Calculation methodology: The calculation of % of diesel used is derived from the following = $(\text{diesel from construction} + \text{operations}) / \text{diesel used in baseline year} \times 100$.

Assumptions: Until baseline of diesel usage has been undertaken, a qualitative update on policy, technical specification or innovation/ trials achieved in the financial year will be provided.

Data maturity RAG: NA

2. Minimise waste and sustainable use of materials

2.1 Achieve zero waste to landfill across our construction projects.

Baseline: 98% diversion from landfill (FY20).

Metric: % diverted from landfill.

Scope: The scope covers schemes running over 8 weeks in duration (schemes below 8 weeks generally produce low volumes of waste) unless a scheme under 8 weeks is known to produce high volumes of waste. Schemes delivered under NGET Asset Operations Management are excluded from the metric.

The landfill diversion target will include all waste produced on site including construction, demolition, and excavation.

Excluded from scope: Certain waste streams are excluded. Due to the current UK waste industry infrastructure and technology, these waste streams cannot currently be diverted from landfill. This list is subject for review year-on-year. The list for FY24 includes:

- Any hazardous classified waste that cannot be successfully/economically treated to a form that would make diversion feasible, for example contaminated soil and asbestos.
- Incinerator bottom ash (generated from construction works) classified as hazardous.

Additional reporting: The report describes a total of 223,836 tonnes of construction waste produced in FY24. However, for the fulfilment of Ofgem’s reporting requirements, Table 1 displays the total tonnage of waste produced by NGET, with the

addition of the excluded waste streams reported in the report.

Table 1: Final destination of total waste produced for FY24 (with excluded waste streams)

Waste generation	Reused	Recycled	Diverted	Total diversion	Landfill
Construction* (tonnes)	112,300	111,176	73	223,549	1,514
Construction (%)*	50%	49%	0%	99%	1%
Operational (tonnes)	71	3,632	812	4,515	139
Operational (%)	2%	78%	17%	97%	3%
Office (tonnes)	0	49	42	91	0
Office (%)	0%	53.51%	46.49%	100%	0%
Total (tonnes)	112,371	114,857	927	228,155	1,653
Total (%)	49%	50%	0%	99%	1%

*Includes excluded European Waste Catalogue data which accounts for 613.34 tonnes.

Calculation methodology: The calculation is derived from the following: Landfill diversion % = (waste sent to landfill per annum / total waste per annum) x 100.

The calculation is based on data collected from the Principal Contractors of individual schemes on a monthly basis via the Contractor’s Sustainability Portal. This is a SharePoint site used by contractors to log performance data.

Assumptions: The Principal Contractors for all projects have employed competent individuals to ensure compliance with relevant waste regulations throughout the duration of the scheme. Data reported via the Contractor’s Sustainability Portal has been reviewed and inputted by a person

competent to do so. A high-level assurance check is undertaken by NGET to identify and rectify any anomalies as part of reporting works. Quality of data ownership varies across the contractors and regions. We are working to understand the confidence levels of reporting from our contractors. Currently, if we find any issues, contractors are contacted for clarifications at quarterly vendor meeting.

If our landfill performance is greater than 99.5%, we will be reporting performance as 100% landfill diversion. The Carbon Trust define zero waste to landfill of that at least 99% of generated waste is diverted away from landfill. Which means that all waste produced is either reused, recycled, composted, or sent to energy recovery

Data maturity RAG: ●

2.2 All construction projects to report on waste avoidance opportunities.

Baseline: NA

Metric: Number of construction projects reporting on waste avoidance opportunities.

Scope: The scope covers schemes running over eight weeks in duration (schemes below eight weeks generally produce low volumes of waste) unless a scheme under eight weeks is known to produce high volumes of waste. Schemes delivered under NGET Asset Operations Management are excluded from the metric.

Calculation methodology: All construction projects are to identify any changes in process, procedure and methodology at project design and delivery stage that will prevent the generation of waste, and encourage the use of surplus materials.

Contractors are required to report the volume of waste avoided once the opportunity has been realised, which can lead to a time delay in reporting. This has occurred in FY24.

Assumptions: The Principal Contractors for all projects for each scheme have employed competent individuals to ensure compliance with relevant waste regulations throughout the duration of the scheme. Data reported via the Contractor's Sustainability Portal has been reviewed and inputted by a person competent to do so. Noting that a high-level assurance check will be undertaken by NGET to identify and rectify any anomalies as part of reporting works. Quality of data ownership varies across the contractors and regions. We are working to understand the confidence levels of reporting from our contractors. Currently, if we find any issues, contractors are contacted for clarifications at quarterly vendor meeting.

Data maturity RAG: ●

2.3 Maintain an 80% recycling rate in construction.

Baseline: NA

Metric: % recycling rate

Scope: Recycling includes the recycling of waste materials into other items and the reprocessing of organic material, but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations on landfill sites (i.e., landfill restoration).

Excluded from scope: It is noted that certain waste streams are excluded. Due to the current UK waste industry infrastructure and technology, these waste streams cannot currently be diverted from landfill.

This list is subject for review year on year. The list for FY24 includes:

- Any hazardous classified waste that cannot be successfully/economically treated to a form that would make diversion feasible, for example contaminated soil and asbestos.
- Incinerator bottom ash (generated from construction works) classified as hazardous.

Calculation methodology: Recycling % = (waste recycled in review period / total waste in review period) x 100.

Assumptions: The Principal Contractors for all projects for each scheme have employed competent individuals to ensure compliance with relevant waste regulations throughout the duration of the scheme. Data reported via the Contractor's Sustainability Portal has been reviewed and inputted by a person competent to do so. Noting that a high-level assurance check will be undertaken by NGET to identify and rectify any anomalies as part of reporting works. Quality of data ownership varies across the contractors and regions. We are working to understand the confidence levels of reporting from our contractors. Currently, if we find any issues, contractors are contacted for clarifications at quarterly vendor meeting.

Data maturity RAG: ●

2.4a Increase our operational recycling rates from 45% to 60%.

Baseline: 45% (2019/2020)

Metric: % increase in recycling rates.

Scope: Operational recycling is provided by five suppliers as follows:

- Biffa data for substations and Overhead Line depots.
- Adler and Allan data for fly tipping and emergency works completed on NGET sites.
- Oil Management Unit data for oil that is sent for disposal.
- Overhead Line Minor Schemes data (CF Booths)
- John Robson Metals for substations and Overhead Line depots.

Excluded from the scope of this metric is Biffa data from central offices, Adler and Allan data for maintenance works and any other waste stream for NGET. Operational waste stream excluded due to miss in baselining (Adler and Allan) is approximately 6.5x the streams reported by tonnage, therefore the reported figure is not a meaningful snapshot of operational waste.

Calculation methodology: Waste data is provided by our five suppliers and aggregated together. The calculation is derived from: (Closed loop recycling + Open loop recycling + composting) / total waste = percentage of total waste recycled.

Assumptions: Biffa hazardous waste that is not sent to landfill is classed as closed loop recycled. Biffa has provided a level of data to show high (>95%) recycling for some elements of our hazardous waste.

Data maturity RAG: ●

2.4b Increase our office recycling rates from 46% to 60%.

Baseline: 46% (FY20)

Metric: % increase in recycling rates.

Scope: The scope includes the following recycling streams: general waste, dry mixed recycling,

organic waste, glass, metal, wood, confidential paper, hazardous waste (batteries and lamps), IT equipment and used catering oil.

The scope includes the waste generated at:

- 47% of National Grid House (based on NGET's share of building occupancy)
- 100% of Eakring Training Centre

Calculation methodology: The calculation is derived from the following: Total recycling % = (recycled waste/ total waste)*100

Assumptions: Biffa average container weights are applied where actual tonnage from on-vehicle weighing is not available. Confidential paper tonnage is calculated by the supplier based on time on site (kg material destroyed /minute).

Additional Notes: NGET Allocation percentage for NGH is recalculated annually, to reflect occupancy changes within the building.

Didcot waste is excluded as being primarily operational and logistics in nature with office waste being inseparable from total and insignificant in volume.

IT equipment, hazardous and catering oil wastes have been included in the scope for completeness from FY24.

Data maturity RAG: ●

2.5a Reduce the waste tonnage (from a FY20 baseline) at our offices by 20%.

Baseline: 124.6 tonnes (2019/2020).

Metric: % reduction in waste tonnage.

Scope: The scope includes the following recycling streams: general waste, dry mixed recycling,

organic waste, glass, metal, wood, confidential paper, hazardous waste (batteries and lamps), IT equipment and used catering oil.

This scope includes the waste generated at:

- 47% of National Grid House (based on NGET's share of building occupancy)
- 100% of Eakring Training Centre

Calculation methodology: The calculation is derived from the following: Total waste reduction % = ((total waste for the review period)/ baseline) x100

Assumptions: Biffa average container weights are applied where actual tonnage from on-vehicle weighing is not available. Confidential paper tonnage is calculated by the supplier based on time on site (e.g. kg material destroyed /minute).

Additional Notes: NGET Allocation percentage for NGH is recalculated annually, to reflect occupancy changes within the building.

Didcot waste is excluded as being primarily operational and logistics in nature with office waste being inseparable from total and insignificant in volume.

IT equipment, hazardous and catering oil wastes have been included in the scope for completeness from FY24.

Data maturity RAG: ●

2.5b Reduce water use (from a FY20baseline) at our offices by 20%.

Baseline: 13,120m³ (2019/2020).

Metric: % reduction in water tonnage.

Scope: The scope includes the following potable water supplies to:

- 47% of National Grid House (based on NGET's share of occupancy)
- 100% of Eakring Training Centre
- 100% of Didcot stores

Excluded from scope is rainwater or grey water capture.

Calculation methodology: The 2019/20 baseline was developed using estimates based on latest available supplier invoices and verifiable meter reads and multiplied by the allocation factor. Invoices are received via Utilities Bill Validation Service provider (presently SMS Plc) and verified against manually collected actuals.

The calculation is derived from the following: Total water reduction % = (total in scope water for the review period / total in scope water for the baseline period) *100.

Additional notes: NGET Allocation percentage for NGH is recalculated annually, to reflect occupancy changes within the building.

Baseline used an allocation of the 37% for all sites. This has been corrected to reflect occupancy and property allocation

Data maturity RAG: ●

2.6 Pilot and implement circular economy principles by aligning our business to international recognised standards.

Baseline: NA

Metric: Alignment to BS 8001 standard - Circular Economy Standard.

Scope: BS8001 Circular Economy Standard provides a practical framework and guidance to organisations to implement the principles of circular

economy. It intends to help organizations and individuals consider and implement more circular and sustainable practices within their businesses.

Calculation methodology: BS8001 has been used as a guidance standard to assess our approach to embedding circular economy in NGET. Maturity levels are evaluated using the BS8001 framework. A maturity level is assigned from level 0 to level 4. Progress against maturity levels will be tracked year on year. No gap analysis or review was undertaken in FY24 due to resource constraints. However, a level of ambition from the business was achieved to define the levels of improvement needed.

Assumptions: Gaps analysis is carried out internally, it is not externally assured.

Data maturity RAG: 

2.7 Align our Procurement Strategy to international recognised standards.

Baseline: NA

Metric: Alignment to ISO 20400 standard - Sustainable Procurement Guidance Standard.

Scope: ISO 20400 Sustainable procurement provides guidance to organizations, independent of their activity or size, on integrating sustainability within Procurement. It is intended for stakeholders involved in, or impacted by, procurement decisions and processes.

Calculation methodology: ISO20400 has been used as a guidance standard to assess our approach to embedding sustainability into the Procurement function in the UK and Globally. They have developed a dedicated online platform available here (<https://www.iso20400.org>) and offline to facilitate the undertaking of the ISO 20400 self-assessment. This platform is funded and managed

by Action Sustainability Community Interest Company Ltd, a UK registered social enterprise dedicated to building the body of knowledge around sustainable procurement. National Grid has conducted an ISO20400 gap analysis/self-assessment bi-annually using through the online platform or a PDF version of the questions.

The self-assessment results are depicted in a radar chart outlining the company's sustainable procurement position against four (4) core pillars: fundamentals, policies and strategies, enablers and procurement processes. Every pillar contains various questions against which we score our performance from 0 to 5. The ISO 20400 guides each score alongside each question to support the scoring. The self-assessment's outcomes are considered to identify smart actions with established timelines to track progress year-on-year and improve future assessments. The outcome from the self-assessment is not in any way endorsed, checked or approved by the Action Sustainability Community Interest Company Ltd (ASCIC) or any other 3rd party. Finally, the output is stored on an internal online repository accessible to specific stakeholders upon request.

The latest gap assessment was completed in August 2023.

Assumptions: Reporting is focused on the environmental aspects of sustainable procurement only.

Data maturity RAG: 

2.8 Maintain our high standards of oil containment and pollution management.

Baseline: NA

Metric: Number of sites receiving environmental support visits.

Scope: The number of site visits being conducted in FY24.

Calculation methodology: The number of site visits is tracked in an internal SharePoint tracker detailing the location of the site to be visited, the visit status / date, and relevant site team leader. This also links to a visual dashboard which totals the number of visits. The total number of site visits conducted is derived from the internal tracker and dashboard.

Assumptions: There are secondary oil containment installed across our substations, including bunds and oil interceptors. Fluid filled cables are managed in line with the ENA Operating Code on the management of fluid filled cable systems, agreed between the ENA liaison group members and with the Environment Agency.

Data maturity RAG: 

3. Nature positive

3.1 Increase environmental value of non-operational land by 10% against a natural capital/ biodiversity baseline.

Baseline: The baseline for this metric is £281.6m (FY21).

This baseline was established using existing information from National Grid's internal site databases and was based on a sub-set of sites and extrapolated. The natural capital value of 29 NGET sustainability sites, covering 377 hectares, were assessed as part of the sustainability projects in T1 using the internal National Grid Natural Capital Tool and used by Frontier Economics to estimate the average baseline value per hectare.

The National Grid non-operational estate extent is relatively dynamic and changes over time due to land being disposed of, to non-operational land being re-designated for operational uses (for example substation extensions etc.), and for the provision of Biodiversity Net Gain (BNG) for capital delivery projects. To ensure that the baseline is comparable between the start of the RIIO-T2¹ period and the end any sites that leave the non-operational estate (sold or become operational) and new land entering the non-operational estate (for example decommissioned assets) will be excluded. This means that only land that remains within the non-operational at the beginning of Year 1 and at the end of Year 5 will be counted.

Scope: % of non-operational land enhanced in environmental value. The target applies to land owned by NGET where we own a freehold or a long leasehold (>21 years). It includes land which is subleased to others. In order to be able to fairly compare at the start and end of the period 1st April

2021 –31st March 2026, only land owned as non-operational land at both the start and end of the period is included.

It is noted that habitat creation or enhancements within non-operational land resulting from the mitigation of National Grid construction activities are covered by a separate commitment and associated incentive within the ESIt and are therefore out of scope of the Environmental Value target.

Metric: % increase in environmental value of non-operational land.

Calculation methodology: NGET developed a tool to measure the environmental and societal value of our land. This tool uses a 'natural capital' evaluation approach that monetizes the 'ecosystem services' that are provided by our land. The Natural Capital Values represented in the tool are estimated over 30 years and reflects the present value and uses a discount rate of 3.5%.

In order to meet our annual commitments, delivery will be counted towards the target at an appropriate point that signifies a change in activity. This will be:

- a) the point at which work carried out by NG or our subcontractors begins at a site
- b) a legal agreement is signed with a third party for them to make changes/carry out works, or
- c) when land management practices are formally changed and documented.

The calculation is derived from the following: % of non-operational land enhanced = (sum of site interventions – sum of site baselines) / NGET portfolio baseline.

Assumptions: The ecosystem services and the assumptions made are provided below.

- Region and location are specified for all sites targeted for uplift as these alter the monetised value of various ecosystem services (land prices, agricultural production etc.).
- Natural capital stocks are entered as the extent of habitats present. The categorisation specified within the tool is followed without alteration; it is a broader characterisation than established in the baseline. This sees certain habitat groups combined (for example scrub falls within the grassland category).
- Food –where National Grid land is leased for grazing or arable production the extent is entered into the tool interface. The environmental gain plans (i.e. the after scenario) assume food production is ceased within the National Grid site in question.
- Timber –it is assumed that there is production of wood products (logs, coppice poles etc.) produced from 50% of each woodland area (unless specified –some woodlands are considered too small to provide a realistic basis for timber production). These wood products are the incidental results of habitat management and not a result of management (including clear felling) as commercial forestry. The 50% of arisings not eligible for sale (through woodland management practices) are to be retained for the creation of dead wood habitats.
- Carbon –the extent of the habitats considered within the NC tool with respect to carbon are entered for the baseline and after scenario.
- Air quality –this ecosystem service is specified for completeness, however it is acknowledged that the type of activities being undertaken mean the before / after scenarios will be the same (i.e. they will not alter the air quality in the specified area).
- Flood control –as with air quality this ecosystem service is specified for completeness. It is

acknowledged that in most instances the before / after scenarios will be the same (unless there is a desire to create new wetland habitat) and that this will result in a “blank” entry (i.e. none of the broad habitat types specified in the tool for flood control are present or predicted to be present).

- Pollination – where National Grid are proposing the creation of species-rich grassland or the provision of bee hives, this ecosystem service is specified. The measurement of farmland within 1.4km is measured using AiDash ISMS, utilising CORINE Land Cover 2018 data. The baseline scenario is always left blank, this is because the tool does not allow an enhancement to be shown effectively (for example a baseline scenario of 5ha of semi-natural grassland, provides the same value as the enhanced scenario regardless of whether the aim is to markedly increase species diversity and attractiveness to pollinators.
- Recreation – for most sites, it is assumed that no additional recreational activities, other than volunteering or education will be offered. Current site usage is not entered as the information available is inconsistent and any change is what is relevant in meeting the target. For the majority of sites volunteering opportunities are expected, with an average spend per visit specified as £50 per visit (figure provided to National Grid by the Field Studies Council). On sites where there are existing environment centres additional visits of volunteers and students have been estimated through discussion with the operators (again specified as £50 per visit). Where there are sites with either new public access or improved public access proposed, that is not possible to determine exact visitor numbers for, relevant ad-

hoc recreational activities are selected within the tool.

- Community – average house prices for each area has been obtained from www.zoopla.co.uk. The extent of residential development within 1km of the site is measured using AiDash ISMS utilising CORINE Land Cover 2018 data. Under 10ha of residential development is considered to be “low”, between 10 and 50ha “medium” and over 50ha of residential development “high” density.
- Wild species – this accounts for positive action to enhance habitats for flora and fauna. This section is completed on the basis that currently there is no positive management for biodiversity (this would be completed for the baseline at the few sites where active management agreements are in place – although these sites are not the targets for environmental gain uplifts). It is also noted that woodland is not included in the list as it is passed through as a benefit in both the before and after scenario at the same rate. This means it is not possible to demonstrate directly an enhancement to woodland. As the BNG system shows that enhancements to woodland are achievable and desirable, and National Grid have a large woodland landholding that currently is of limited biodiversity value, a proxy has been used in the National Grid NC tool to recognise any investment in woodland enhancement. This is done through assuming that the “provision of winter bird food” is analogous to woodland enhancement (this provides a similar level of monetary value as enhancing a grassland and is therefore considered a reasonable equivalence).

Data maturity RAG: 

3.2 Deliver Net Gain by at least 10% or greater in environmental value (including biodiversity) on all construction projects (including those delivered by third parties building on our land)

Baseline: There is no existing baseline for this metric as BNG units are calculated on an individual project basis

Scope: NGET construction schemes (in Asset Operations, Customer Connections and Strategic Infrastructure) (governed by the National Grid Network Development process) that have a permanent or temporary impact on the natural environment between 1 April 2021 and 31 March 2026 and have:

- Passed project sanction post-design stage
- Applied for, and been granted planning permission / consent within this period
- Committed to a net gain % of 10% or greater quantified by specified tools

Schemes that are excluded from the scope of this metric include those that:

- Have submitted a formal planning application, already passed Gate C, or have been sanctioned before 1 April 2021.
- NGET schemes forming a constituent part of a 3rd Party Development Consent Order (DCO) that has been submitted or consented prior to 1 April 2021.
- Any schemes which do not have a permanent or temporary impact on the natural environment (such as protection and control system schemes or in-situ asset refurbishment or replacements).
- Minor overhead line schemes such as fittings or steelwork replacement that do

not utilise OHL exception regulations or Section 37 consent.

Metric: % of projects in scope that meet 10% BNG.

Calculation methodology: In order to quantify biodiversity losses and gains, we use the Statutory biodiversity metric. The metric works by considering the extent of habitat within the scope of development (measured in hectares (ha) or kilometres (km) dependent on whether the habitat is linear or not) and how distinctive it is (i.e. its complexity, rarity, diversity etc. This is predefined within the metric), its condition (i.e. its structure and management as defined by Natural England) and its strategic location. These elements are used to determine the biodiversity baseline value (measured in biodiversity units) the losses due to the development, and the gains made from its proposed habitat mitigation and enhancement measures. The biodiversity unit value of habitat creation or enhancement actions are refined based on a number of risk multipliers that account for the difficulty of habitat creation (for example it is easier to create a semi-improved grassland than an active raised bog), the time it takes for a habitat to reach target condition (for example a grassland reaches target condition quicker than a woodland), and the location of delivery (i.e. habitat creation local to the biodiversity loss is worth more than habitat creation unrelated to the impact).

The calculation is derived from the following:
$$\% \text{ BNG} = (\text{sum of onsite and offsite biodiversity units added post intervention minus sum of onsite and offsite baseline biodiversity units}) / \text{sum of total baseline units} \times 100$$

% Net Gains are based on Habitat Biodiversity Units only – hedgerow and river units are recorded where applicable within the statutory biodiversity metric but are not considered within the % calculation for this commitment. Where

post development biodiversity units are not yet available an estimate is derived based on the baseline habitat units and % commitment at the relevant governance milestone.

Natural Capital / Ecosystem service benefits derived from habitat and land use change associated with our developments where relevant will be incorporated alongside the BNG calculations within RIIO-T2¹ period following agreement and approval of a consistent approach and calculation methodologies across all Transmission Owners. Wider environmental benefits where applicable are captured qualitatively and not incorporated into the overall % commitment.

How we identify schemes within scope

At the early project development stage engineers are required to identify if the scheme will have an impact on the natural environment and therefore be within scope of the BNG commitment. If confirmed within scope a BNG rating of Low / Med / High or Very High will be recorded within the project documentation and the scheme added to the relevant BNG tracker.

Schemes in scope will appoint environmental services contractors to undertake the BNG assessment and support the development of mitigation and enhancement strategies through the detailed design stage. A % BNG commitment will be determined prior to Gate C, or Sanction and be underpinned by an outline BNG plan that includes onsite and offsite interventions and associated calculations.

Assumptions: BNG commitments are underpinned by accurate assessments based on robust and reliable data, all prescribed interventions will be delivered as part of the project via formalised

agreements with internal and external parties and contractors.

Where mitigation and enhancement plans are still in development, post intervention biodiversity units have been estimated using initial baseline calculations - these will be refined and updated on completion. Where baseline biodiversity units are yet to be finalised, an estimate based on a previous BNG assessment is used. These will be refined and updated on completion.

BNG Assessments are completed by competent specialists using the latest version of the DEFRA Biodiversity Calculator.

Planned enhancements onsite and offsite are delivered and managed in accordance with the prescriptions detailed within the tools and the management plans.

It is also assumed that all schemes with an impact to the natural environment have been included within scope.

Data maturity RAG: ●

3.3 Work collaboratively with other transmission owners to agree a consistent approach to measure biodiversity impact and dependencies in the supply chain (inc. water).

Baseline: NA

Scope: Work with innovation partners to develop an approach and tools that can utilise procurement data from Transmission and Distribution owners to assess the global biodiversity impacts and dependencies of the materials and assets procured via the supply chain.

The toolkit and PowerBI dashboard will align with industry best practice, incorporate accepted

methodologies for assessment and quantification
,support future reporting and disclosure
requirements and provide key insights to support the
setting of smart supply chain targets within the next
regulatory period.

Metric: Actions delivered according to project plan

Calculation methodology: Not applicable.

Assumptions: Supply chain data is of suitable
granularity to derive meaningful outcomes and
specific risks and dependencies.

The outputs of the innovation project will be
incorporated into business as usual (BAU) by
Transmission Owners and used consistently across
the sector and rolled out to DNOs.

Outcomes of the project will align with future
Biodiversity / Nature reporting requirements and
frameworks.

Data maturity RAG: ●

4. Leadership for change

4.1 Have an engaged workforce on environmental issues that lead by example.

Baseline: 71% score (FY21 baseline)

Scope: All permanent NGET employees.

Metric: Employee engagement survey satisfaction score on environmental issues (%).

Calculation methodology: Evaluation of our internal colleague survey – Grid:voice. Colleagues were asked if they thought we behaved in a responsible way. The responses to this survey are based on a six-point response: strongly agree, agree, neither agree / nor disagree / disagree / strongly disagree do not know / not applicable. The % of those that strongly agree or agree determine our % score.

Assumptions: None.

4.4 Work collaboratively with other transmission owners to find common solutions and develop a consistent approach to sustainability issues.

Baseline: NA

Scope: The scope includes UK transmission networks: Scottish and Southern Energy Networks (SSEN) and Scottish Power Energy Networks (SPEN). Collaboration is focused on environmental sustainability i.e. carbon, resource use, biodiversity, reporting and strategy development.

Metric: Programme with focus areas and key deliverables published.

Calculation methodology: NA

Assumptions: None.

Data maturity RAG: ●

Data maturity RAG: ●

4.2 Take bold steps to tackle our SF₆ emissions and stimulate the market to more rapidly meet our stakeholders needs.

Baseline: NA

Scope: New assets for use at all voltage levels, including gas insulated busbars (GIB) and gas insulated lines (GIL). Pre-existing SF₆ filled assets which are retro-fillable are also within scope.

Metric: No procurement of new SF₆ filled assets when there are alternatives available in the market. Targeted deployment of commercially available retro-fill solutions.

Calculation methodology: No deviations from SF₆ policy.

Assumptions: None.

4.5 Be an environmental leader for the energy industry by actively contributing and shaping the discussions in external working groups.

Baseline: NA

Scope: Number of groups/ meetings and/ or initiatives that NGET is contributing to from an environment and/or sustainability perspective. This may include initiatives done by the NGET group.

Metric: Number of groups/ meetings and/or initiatives attended externally on environmental sustainability.

Calculation methodology: Not applicable.

Assumptions: None.

Data maturity RAG: NA

4.3 Maintain a certified EMS.

Baseline: NA

Metric : Continuous certification to ISO14001 standard and demonstration of continuous improvement.

: Scope The scope includes NGET's ISO14001 certification being maintained.

Calculation methodology: Certification against standard is provided by an external certification body following an annual ISO14001 audit.

Assumptions: None.

Data maturity RAG: NA

Scope 3 emissions

Our Scope 3 emissions are calculated and reported in line with the GHG Protocol Corporate Accounting and Reporting Standard (Revised) 1, the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard 6 and the Technical Guidance for Calculating Scope 3 Emissions: Supplement to the Corporate Value Chain (Scope 3) Accounting and Reporting Standard 7. National Grid includes all seven Kyoto GHG gases in its Scope 3 inventory. These GHGs are currently: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF₆), and nitrogen trifluoride (NF₃). The GWP factors used in this reporting period are from the IPCC Fifth Assessment Report (AR)-5 unless otherwise stated in the methodology.

Methodology: Scope 3 emissions are defined as all indirect emissions, not included in Scope 2, that occur in the value chain of the reporting company, including both upstream and downstream emissions. We report Scope 3 emissions across six categories, all other categories of scope 3 reporting have been deemed not relevant.

Scope 3 emissions category (cat)	Scope – emission sources for inventory
Cat. 1 + Cat. 2 (Purchased Goods and Services + Capital Goods)	Includes all products and services and capital goods purchased by National Grid Electricity Transmission's (NGET's) Procurement, from stationery to construction products.
Cat. 3 (Fuel and Energy Related Activities)	This category includes Well-to-Tank (WTT) upstream emissions of purchased fuels and electricity. These are upstream emissions associated with extraction, refining and transportation of the raw fuel sources to an organisation, prior to their combustion. WTT emissions are calculated using DESNZ and IEA emission factors.
Cat. 5 (Waste Generated in Operations)	Includes all waste generated from our operations, including office waste, operational waste, and construction waste by NGET field operations. In some cases, where waste stream classification is unknown, the waste emissions are estimated using an average emission factor.
Cat. 6 (Business Travel) Including Air Travel	Includes employee business travel, not in National Grid owned vehicles (air travel, hire cars, personal cars and rail travel).
Cat. 7 (Employee Commuting)	Includes emissions based on commuting distances of our employees to their offices and includes travel types such as bus, car, and train.

Quantifying and reducing scope 3 emissions:

Annual Scope 3 emissions data across all categories is reported total (tCO₂e). See Table 1 below for detail on how emissions in each category are calculated. In FY24, we aligned to the Group Reporting Methodology for Cat. 1 and Cat. 2 emissions. We have partnered with Resilience; a specialised climate analytics company uses technology pioneered by the Centre for Risk Studies at the University of Cambridge Judge Business School and used their global emissions factors that are estimated at a Global Industry Classification Standard (GICS) industry level.

Table 1. Scope 3 Emissions Calculation Methodology:

Category	Emissions (t CO2e) 2020 baseline	Data Maturity	Materiality	Description	Current Carbon Reduction Commitments/Actions
1: Purchased goods and services	82,004	Medium	High	Global annual spend on purchased goods and services and capital goods multiplied by Resilience database factors for emissions based on \$USD spend. To ensure accuracy and avoid double-counting, a filter is applied to remove cash payments to vendors that are already included within Scope 1, Scope 2 or other Scope 3 categories of the GHG Protocol.	We have recently set a new target that 80% of our supply chain by emissions must have Science-Based Targets by 2030 and therefore be reducing their own emissions.
2: Capital goods	195,076	Medium	High	Resilience, a specialised climate analytics company uses technology pioneered by the Centre for Risk Studies at the University of Cambridge Judge Business School and we use their global emissions factors that are estimated at a Global Industry Classification Standard (GICS) industry level. Spend data is extracted from a Power BI Data Visualisation tool. Spend categories applied to each spend line were analysed and refined using GICS industrial classification. Each spend line (excluding VAT) on the financial ledger is assigned to a spend category using utility vendor database (UVDB) information. Each spend category has then been allocated a Resilience emission factor. For NGET reporting only spend relating to NGET was included in our reporting. As a future improvement we are working to identify spend for shared services and may include a percentage of this if it appropriate.	Our Commitment to carbon neutral construction by 2026 will drive carbon reduction in this area.

3: Fuel and energy related activities	177,324	High	Medium	<p>Extraction, production and transportation of fuels and energy purchased or acquired by the reporting company in the reporting year, not already accounted for in Scope 1 or Scope 2. Upstream emissions of purchased fuels (extraction, production and transportation of fuels consumed by NGET) and upstream emissions of purchased electricity (extraction, production, and transportation of fuels consumed in the generation of electricity, steam, heating and cooling consumed by the NGET). Emissions calculated for electricity, transport and fuel lifecycles using measured units from existing Scope 1, 2 and Scope 3 emission activities.</p> <p>Emission factor: UK government GHG conversion factors for company reporting > WTT-Fuels > various factors and WTT- UK & overseas electricity > WTT- UK electricity (generation) > Electricity: UK.</p>	We are converting our fleet and transitioning away from diesel over the remainder of the decade. As we connect more renewables to the grid the emissions associated with line losses will decrease in the long term.
5: Waste generated in operations	3,830	High	Low	<p>Includes waste generated from our operations including office waste, operational waste and construction waste. The emissions are calculated from the measured units of each waste type multiplied by DESNZ (UK government) emissions factors for the relevant disposal method. An average emission factor is used where details of the Scope 3 waste stream are not available.</p> <p>National Grid has a number of contracts with waste collection organisations covering the UK business, which provide data in volume or mass of waste. For construction waste, we receive this data from our</p>	Our waste commitments as part of our environmental action plan will reduce waste and increase recycling - minimise our emissions from waste as well.

				<p>contractors carrying out the work on our behalf.</p> <p>Emission factor: UK government GHG conversion factors for company reporting > Waste disposal.</p>	
6: Business travel	73	High	Low	<p>Includes the mileage data from Private Cars, Hire Car Mileage (from our service provider Enterprise), Air and Rail Travel Data from our Travel Booking Provider (Concur Travel) multiplied with the DESNZ emission factor for the respective Car Category (Size, Type of Fuel) for Cars, and Travel Emissions for Rail and Air.</p> <p>Most NGET employees use a system where employees can book a range of travel options, using third-party travel providers. The distance (km) from the travel provider's report is multiplied by the emission factor.</p> <ul style="list-style-type: none"> Emission factor: Government conversion factors for company reporting of GHG emissions > Business Travel – Land > Rail/Air/Passenger vehicles/Ferry average passenger/Freighted goods For Air travel DESNZ/DEFRA 2023 factors for April – May 2023 and DESNZ/DEFRA 2023 factors for June – March 2024) 	<p>We have a commitment to reduce business travel by 10 per cent from 2013-2020 averages. We are currently overperforming as digital tools like Teams are use more frequently than travelling long distances for short meetings. Public transport and car sharing is also encouraged.</p>
7: Employee commuting	2,088	Medium	Low	<p>Includes emissions based on commuting distances of our employees to their offices and includes travel types such as bus, car and train.: We currently use survey results that polled daily commute behaviours (frequency and miles travelled) and travel</p>	<p>We continue to support flexible working and have a project to retrofit offices on our operational sites so that people can go to more local offices in future.</p>

methods (e.g. car, train, bus, etc.) amongst a sample of employees (in August 2023).

Each method's one-way mileage is then:

- multiplied by the number of months worked per year (factoring in average time off), average commuting days per month, one-way commuting distance, two (to account for a round trip), and divided by the number of commuters (including the employee) to account for carpooling, resulting in an average annual mileage per employee by travel mode;
- multiplied by the count of employees to obtain total annual mileage for National Grid commuting by transport mode; and
- multiplied by the relevant UK government conversion factors/EPA Emissions Factors Hub emission factor (the use of 'regional' emission factors in line with the Protocol) for the transport type and reporting year.
- Emission factor: UK government conversion factors for company reporting of GHG emissions > Business Travel – Land > Bus/Car/Rail; EPA GHG Emission Factors Hub – Table 10: Scope 3 Category 6: Business Travel and Category 7: Employee Commuting.

With the new survey reflecting the latest commuting habits (including hybrid and fully remote), building occupancy measures are no longer included in the calculation

Data Maturity Matrix

We aim to deliver a high quality annual environmental report. For full transparency, we have provided a data maturity RAG to all our commitments to allow stakeholders to see how mature we are in terms of the: completeness, accuracy, reliability, timeliness, integrity and existence of our data. We have done this through an internal self-assessment. We apply these reporting principles to deliver good quality and credible information. We review our data quality and limitations on annual basis to improve the maturity of our data and reporting.

Overall confidence	Data Quality Index						
	<u>Completeness</u>	<u>Accuracy</u>	<u>Reliability</u>	<u>Timeliness</u>	<u>Integrity</u>	<u>Existence</u>	<u>Assurance</u>
	>85%	>85%	>85%	>85%	>85%	>85%	External assurance completed
	65%	65%	65%	65%	65%	65%	External verified tool for measurement and internal assurance completed
	65%	65%	65%	65%	65%	65%	External, verified tool used for measurement and internal assurance completed
	<45%	<45%	<45%	<45%	<45%	<45%	Internal assurance performed, but big gaps in data quality and maturity
	N/A	N/A	N/A	N/A	N/A	N/A	Qualitative assessment internally verified