Carbon reduction plan

2nd July 2026

Navenio Limited

Carbon reduction plan

Commitment to achieving Net Zero

Navenio Limited is committed to achieving Net Zero greenhouse gas emissions by 2045, in alignment with the NHS Net Zero Supplier Roadmap and the NHS's "Carbon Footprint Plus" target. While the UK has a statutory commitment to reach Net Zero by 2050, we have chosen to adopt the NHS's more ambitious 2045 target in recognition of our role as a supplier to the NHS and to the wider healthcare sector.

As a UK-headquartered healthcare technology business serving the NHS and broader healthcare market, we have a responsibility both to measure our own emissions accurately and to demonstrate clear progress towards Net Zero in line with the standards expected by our customers.

Baseline emissions footprint

Baseline emissions are a record of the greenhouse gases that were produced in the past and were not influenced by any carbon reduction initiatives.

ORGANISATIONAL BOUNDARY

Emissions are reported on a consolidated basis using the operational control approach as defined in the GHG Protocol Corporate Standard. The reporting boundary covers:

- Navenio Limited, registered in England and Wales, registration number 09845565, registered office 167-169 Great Portland Street, London. W1W 5PF
- Navenio Inc, a wholly-owned US subsidiary, which provides commercial and operational support and whose employees contribute to UK and global projects

All emissions arising from the operations of both entities, including US-based employee homeworking and business travel, are included in the figures below. This consolidation approach is consistent with the requirements of the NHS Net Zero Supplier Roadmap, which from April 2027 requires suppliers to report on global Scope 1, 2 and 3 emissions.

BASELINE YEAR EMISSIONS (2025)

Scope	Description	Emissions (tCO_2e)
Scope 1	Direct GHG emissions	0.00
Scope 2	Purchased Electricity GHG Emissions	0.00
Scope 3	Other Indirect GHG Emissions	
	Cat 1: Purchased Goods and Services	3.51
	Cat 2: Capital Goods	0.00
	Cat 3: Fuel and energy-related activities	0.00
	Cat 4: Upstream Transportation and Distribution	0.00
	Cat 5: Waste generated in operations	0.00
	Cat 6: Business Travel	25.59
	Cat 7: Employee Commuting (includes WFH emissions)	9.03
	Cat 9: Downstream Transportation and Distribution	0.00
	Total (Scope 1, 2 & 3)	**38.13**
	Scope 1 and 2 only	**0.00**

METHODOLOGY AND ASSUMPTIONS

Emissions have been calculated in accordance with the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard, supplemented by the Scope 3 Calculation Guidance. Conversion factors are taken from the UK Department for Energy Security and Net Zero (DESNZ) 2025 Greenhouse Gas Conversion Factors, with the exception of:

- Homeworking emissions, which use the methodology set out in the EcoAct Homeworking Emissions Whitepaper (DEFRA-aligned combined factor of 0.33378 kg CO_2e per WFH hour for UK staff and 0.55 kg CO_2e per hour for US staff, reflecting the higher carbon intensity of the US national grid)
- Cloud computing emissions (AWS), which are taken directly from the AWS Customer Carbon Footprint Tool (CCFT v3.0.1) using the market-based method (MBM)
- IT equipment and product hardware, which use the DEFRA 2025 spend-based environmental input-output factor for "Computer, electronic and optical products"

Where primary data was not available, estimates have been used in accordance with paragraph 7.2 of the GHG Protocol Scope 3 Calculation Guidance, which explicitly permits use of average-data and spend-based methods when primary data cannot reasonably be obtained.

CONTEXT FOR THE BASELINE FIGURES

The Group operated as a fully remote business throughout 2025. The Company's Oxford office was vacated in November 2024 and its Dumfries office in December 2024, with all staff working from home from that point onwards.

Navenio Inc has also operated on a fully remote basis. Scope 1 (direct emissions from gas, refrigerants and company vehicles) and Scope 2 (purchased electricity) are zero for the baseline year.

Business travel (Cat 6) is the dominant contributor at 67% of total emissions, reflecting the Group's operating model. Employee commuting and homeworking emissions (Cat 7) account for 24% of the footprint and are driven entirely by homeworking, as no commuting took place in 2025.

There is no physical product manufacturing, corporate waste management facility, or physical shipping, resulting in zero emissions across Scope 3 Categories 4, 5, and 9.

Current emissions reporting

As 2025 is the baseline year, the current emissions reporting is the same as the baseline emissions footprint set out in Section 2 above. Future Carbon Reduction Plan updates will report current-year emissions against the 2025 baseline.

Emissions reduction targets

In order to continue our progress to achieving Net Zero, we have adopted the following carbon reduction targets, aligned with the NHS Carbon Footprint Plus trajectory:

- By 2030, we project that carbon emissions will decrease by 50% from the 2025 baseline, to approximately 19.1 tCO_2e
- By 2038, we project that carbon emissions will decrease by 80% from the 2025 baseline, to approximately 7.6 tCO_2e, consistent with the NHS Carbon Footprint Plus interim target window of 2036-2039
- By 2045, we project that carbon emissions will reach Net Zero, with any residual emissions offset through high-quality removals consistent with the Oxford Principles for Net Zero Aligned Carbon Offsetting

PROJECTED TRAJECTORY

Year	Projected emissions (tCO_2e)	Reduction vs baseline
2025 (Baseline)	38.13	n/a
2030	19.07	- 50%
2035	11.44	- 70%
2038	7.63	- 80% (within NHS interim window 2036-39)
2042	3.81	- 90%
2045	0.00	- 100% (Net Zero)

These targets are aligned with the NHS Net Zero Supplier Roadmap and are consistent with the level of ambition required by the Paris Agreement to limit global warming to 1.5°C.

Carbon reduction projects

COMPLETED CARBON REDUCTION INITIATIVES

The following measures were already in place at, or before, the baseline year and contribute to keeping our emissions low:

- Fully remote operating model across both Navenio Limited and Navenio Inc, in place since the end of 2024, which eliminates emissions from office heating, electricity, water and waste
- Mandatory Economy-class flight policy saves approximately 60-70% of emissions compared with business class on the same routes
- Use of refurbished IT equipment where suitable, results in approximately 80% lower embodied emissions than new equivalent equipment
- Cloud-first infrastructure, hosted predominantly on Amazon Web Services, leverages AWS renewable energy power purchase agreements

CARBON REDUCTION INITIATIVES IN PROGRESS

Annual measurement and reporting: Navenio has implemented an end-to-end carbon footprint measurement process covering both UK and US operations for the 2025 reporting cycle, and will repeat this annually.

Cloud infrastructure efficiency: ongoing review of cloud resource usage to identify optimisation opportunities and efficiency gains, reducing the carbon footprint of our hosted services.

Travel policy review: assessment of opportunities to consolidate transatlantic trips between UK and US operations, increase use of video conferencing, and prefer rail over short-haul flights where practicable.

ISO 14001 Environmental Management System: Navenio is working towards certification to ISO 14001, which will provide a structured framework for managing and continuously improving environmental performance across the organisation, with carbon management embedded as a core component.

FUTURE CARBON REDUCTION INITIATIVES

In the future we hope to implement further measures including:

Supplier engagement programme under Scope 3 Cat 1: engaging with key SaaS and IT suppliers to understand their own carbon reduction commitments and prioritise lower-carbon providers.

Employee homeworking efficiency: provision of guidance and resources to help UK and US employees reduce their home energy use during working hours (e.g. heating zoning, equipment power management).

Product hardware lifecycle: assessment of opportunities to extend the operational life of BLE beacons and IoT gateways through firmware updates and refurbishment rather than replacement.

Declaration and sign off

This Carbon Reduction Plan has been completed in accordance with PPN 006 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, 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) Standard.

This Carbon Reduction Plan has been reviewed and signed off by the Board of Directors of Navenio Limited.

Dr Agathoniki Trigoni
Chief Executive Officer

2nd July 2026

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