

**EXTRAC**

# Carbon Reduction Plan

ExTrac AI Limited | April 2026

In accordance with PPN 06/21

# Commitment to Achieving Net Zero



ExTrac AI Limited is committed to achieving Net Zero emissions by 2050.

As a technology company specialising in AI-driven open-source intelligence (OSINT) and research analytics services, we recognise our responsibility to minimise our environmental impact. We are committed to measuring, reporting and reducing our greenhouse gas (GHG) emissions across all scopes in a transparent and evidence-based manner.

ExTrac AI Limited was incorporated in December 2022 and operates a hybrid model with a UK-based workforce of approximately 74 active personnel (50 employees, 12 full-time contractors, 5 part-time contractors, 7 ad hoc contractors), predominantly based in the United Kingdom. The company does not own or operate company vehicles, and its primary computing infrastructure is delivered via third-party cloud providers.

Our carbon reduction commitments are embedded in our operational policy and reviewed annually by the board of directors.

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# Baseline Emissions Footprint



Baseline emissions are a record of the greenhouse gases that have been produced in the past and were produced prior to the introduction of any strategies to reduce emissions. Baseline emissions are the reference point against which emissions reduction can be measured.

This is ExTrac AI Limited's first Carbon Reduction Plan. FY2024/25 has been selected as the baseline year as it represents the first full financial year for which comprehensive emissions data is available. Prior to this, the company was in an early growth phase with limited operational activity.

## Notes on scope and methodology:

- Scope 1: ExTrac AI Limited does not operate company vehicles or gas-heated premises under its control. Scope 1 emissions are zero.
- Scope 2 (market-based): Relates to purchased electricity for co-working space usage and any leased office areas. Calculated using the UK grid average emission factor published by DESNZ (0.207 kgCO<sub>2</sub>e/kWh, 2024).
- Scope 3: Calculated using spend-based and activity-based estimates consistent with the GHG Protocol Corporate Value Chain (Scope 3) Standard. Business Travel (Category 6) represents the largest single Scope 3 category, reflecting an international client base requiring some in-person engagement. Cloud computing Scope 3 emissions (data centre energy use attributable to ExTrac's workloads) are not currently within the required reporting subset under PPN 06/21 but are tracked separately and will be incorporated from FY2025/26.
- All emission factors are sourced from the UK Government's published conversion factors for greenhouse gas company reporting (DESNZ/BEIS, 2024 edition).
- Figures represent estimates based on best available data. ExTrac AI Limited will refine these figures as data collection matures.

## Baseline Year: 2025

Emissions	Total (tCO <sub>2</sub> e)	
<b>Scope 1</b> Direct emissions	0.00	No company vehicles, no owned premises
<b>Scope 2</b> Energy indirect – electricity	1.20	Co-working/leased office electricity; UK grid factor 0.207 kgCO <sub>2</sub> e/kWh (DESNZ 2024)
<b>Scope 3</b> Included sources	28.46	
<b>Category 1</b> Purchased Goods & Services	4.10	Spend based estimate, software subscriptions, hardware procurement
<b>Category 4</b> Upstream Transportation & Distribution	0.0	No physical goods in distribution in scope
<b>Category 5</b> Waste Generated in Operations	0.18	Office waste, WRAP UK factor applied to estimated office waste volume
<b>Category 6</b> Business Travel	14.80	Air & Rail travel, actuals estimated from expense data; DESNZ 2024 factors
<b>Category 7</b> Employee Commuting	8.18	UK employees avg 2.1 days/week office attendance, commute distance estimate
<b>Category 9</b> Downstream Transportation & Distribution	1.20	Delivery of software / data services via cloud, estimated data-transfer factor
<b>Total Emissions</b>	<b>29.66</b>	

# Current Emissions Reporting



As this is ExTrac AI Limited's first CRP, the current reporting year is the same as the baseline year.

This is ExTrac AI Limited's first Carbon Reduction Plan. FY2024/25 has been selected as the baseline year as it represents the first full financial year for which comprehensive emissions data is available. Prior to this, the company was in an early growth phase with limited operational activity.

## Baseline Year: 2025

Emissions	Total (tCO2e)	
<b>Scope 1</b> Direct emissions	0.00	No company vehicles, no owned premises
<b>Scope 2</b> Energy indirect – electricity	1.20	Co-working/leased office electricity; UK grid factor 0.207 kgCO <sub>2e</sub> /kWh (DESNZ 2024)
<b>Scope 3</b> Included sources	28.46	
<b>Category 1</b> Purchased Goods & Services	4.10	Spend based estimate, software subscriptions, hardware procurement
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<b>Total Emissions</b>	<b>29.66</b>	

# Emissions Reduction Targets



In order to continue our progress toward achieving Net Zero, ExTrac AI Limited has adopted the following carbon reduction targets, measured against the FY2024/25 baseline of 29.66 tCO<sub>2</sub>e.

Target Year	Projected tCO <sub>2</sub> e	Reduction vs Baseline	Key lever
<b>FY2026/27</b>	25.00	-16%	Supplier engagement; reduce air travel
<b>FY2027/28</b>	21.00	-29%	Carbon-reporting cloud procurement;
<b>FY2028/29</b>	17.50	-41%	Scope 3 Category 1 reduction through green procurement
<b>FY2029/30</b>	14.00	-53%	Continued effort for compute use through sustainable sources
<b>2030</b>	11.50	-61%	Mid-term milestone aligned to UK Government 2030 target
<b>2050</b>	0.00	-100%	Net Zero — residual emissions offset via verified carbon credits

These targets are consistent with the UK Government's commitment to reduce economy-wide emissions by 68% by 2030 (relative to 1990) and to achieve Net Zero by 2050. ExTrac AI Limited will review and update these targets annually in line with improved data, growth of the business, and evolving best practice.

# Carbon Reduction Projects



## Existing Environmental Management Measures

The following environmental management measures are embedded in ExTrac AI Limited's operations and will be in effect when performing any contract:

- **Remote and hybrid working model:** ExTrac operates a remote-first working model for all personnel. This significantly reduces employee commuting emissions and eliminates the need for dedicated permanent office space, with associated energy consumption.
- **Digital-first operations:** All service delivery, reporting, and client engagement is conducted digitally. Paper usage is negligible and physical distribution of deliverables does not occur.
- **Sustainable travel policy:** A company travel policy prioritises virtual meetings over in-person travel. Where business travel is necessary, rail is preferred over air travel for domestic and short-haul European journeys. Senior leadership apply this policy when making procurement decisions affecting travel.
- **Cloud infrastructure:** ExTrac's platform and analytical services run on third-party cloud infrastructure providers (e.g. AWS) that have publicly committed to achieving 100% renewable energy targets, ensuring that computational workloads benefit from increasingly clean energy sources.
- **Equipment lifecycle management:** Company-issued equipment is selected for energy efficiency and longevity. End-of-life electronics are directed to certified recycling or refurbishment programmes in line with WEEE regulations.
- **No company vehicles:** ExTrac AI Limited does not own or operate any company vehicles. All business travel is by public transport, rail, commercial air, or personally-owned vehicles claimed at HMRC advisory rates.

## Future Carbon Reduction Initiatives

In addition to the measures already in place, ExTrac AI Limited commits to the following planned initiatives during the period of this Carbon Reduction Plan:

Initiative	Expected impact	Target date
<b>Introduce formal carbon-aware cloud procurement criteria</b>	Reduce Scope 3 Category 9 emissions by selecting cloud regions powered by higher proportions of renewable energy; estimated 20–30% reduction in cloud-attributable emissions	FY2026/27
<b>Implement business travel pre-approval process</b>	Reduce discretionary air travel by 25% through mandatory line-manager pre-approval and clear preference hierarchy (video > rail > air)	FY2025/26
<b>Conduct supplier carbon assessment for top 10 suppliers</b>	Improve Category 1 Scope 3 data quality and introduce environmental criteria into supplier selection process	FY2026/27
<b>Establish annual GHG inventory process and internal reporting</b>	Improve accuracy of all Scope 1, 2 and 3 estimates; transition from spend-based to activity-based calculations where feasible	FY2025/26
<b>Employee commuting survey and green travel incentive</b>	Quantify commuting emissions accurately and introduce incentives (e.g. rail season ticket loans) to shift employees to lower-emission modes	FY2026/27
<b>Review and adopt a Science-Based Target (SBT)</b>	Align emissions reduction pathway with 1.5°C scenario through SBTi validation process	FY2027/28
<b>Procure verified carbon offsets for residual emissions</b>	Address unavoidable residual emissions via high-integrity offset or removal credits (e.g. Gold Standard, VCS) as a bridging measure toward Net Zero	FY2028/29



# Declaration and Sign Off

This Carbon Reduction Plan has been completed in accordance with PPN 06/21 and associated guidance and reporting standards 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<sup>1</sup> and uses the appropriate Government emission conversion factors for greenhouse gas company reporting<sup>2</sup>.

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<sup>3</sup>.

This Carbon Reduction Plan has been reviewed and signed off by the Executive Leadership Team.

Signed on behalf of ExTrac AI Limited:

**Natasha Malden-Kurzeja**  
Director of Operations

16 Apr 2026

1 Corporate Standard | GHG Protocol

2 Government conversion factors for company reporting of greenhouse gas emissions | GOV UK |

3 Corporate Value Chain (Scope 3) Standard | GHG Protocol