



## Carbon Reduction Plan Wholesum Tech Ltd

*Prepared in accordance with PPN 06/21 and NHS Shared Business Services Carbon Reduction Plan Guidance (v1.2)*

|                          |                           |
|--------------------------|---------------------------|
| <b>Bidder Name:</b>      | Wholesum Tech Ltd         |
| <b>Publication Date:</b> | 7 <sup>th</sup> July 2026 |

### Commitment to achieving Net Zero

Wholesum Tech Ltd is committed to achieving Net Zero emissions by 2050 at the latest, in line with the requirements of PPN 06/21. In support of the NHS's own decarbonisation ambition, we adopt the more stringent NHS-aligned targets of Net Zero for Scope 1 and Scope 2 emissions by 2040, and Net Zero for the included Scope 3 emissions by 2045.

This commitment relates to Wholesum Tech Ltd's own operations. As an early-stage, micro, fully remote organisation with no premises or vehicle fleet at the current time, our emissions footprint is already low; our focus is on keeping absolute emissions low as the business grows, and on maintaining efficient, low-carbon working practices as a matter of policy.

### Baseline emissions footprint

Baseline emissions are a record of the greenhouse gases produced prior to the introduction of any emissions-reduction strategies, and form the reference point against which future reductions are measured.

Wholesum Tech Ltd has not previously published its emissions publicly due to its early stage. In line with the CRP guidance, our first reporting period has therefore been used as our Baseline Year, meaning the Baseline Year and Reporting Year are the same for this plan.

|                       |                                          |
|-----------------------|------------------------------------------|
| <b>Baseline Year:</b> | FY2025/26 (1 April 2025 – 31 March 2026) |
|-----------------------|------------------------------------------|

### Additional details relating to baseline emissions calculations

This is Wholesum Tech Ltd's first Carbon Reduction Plan. As permitted under the CRP guidance, the baseline year is set as the first-year emissions were measured (FY2025/26), rather than an earlier historic year. Emissions have been estimated from primary utility/travel invoices.

Wholesum Tech Ltd is a fully remote AI/software company with no company-operated premises, no owned or leased vehicles, and a headcount of 3 people over the reporting period. This significantly limits the scope of applicable emissions sources, as reflected below.

## Baseline year emissions

| EMISSIONS                  | TOTAL (tCO <sub>2</sub> e) |
|----------------------------|----------------------------|
| Scope 1                    | 0                          |
| Scope 2                    | 0                          |
| Scope 3 (Included Sources) | 0.14                       |
| <b>Total Emissions</b>     | <b>0.14</b>                |

## Basis for each Scope and the required Scope 3 categories

| Scope 3 Category                         | tCO <sub>2</sub> e | Applicable?                                                |
|------------------------------------------|--------------------|------------------------------------------------------------|
| Scope 1 (direct emissions)               | 0                  | N/A – no owned/leased vehicles, no on-site fuel combustion |
| Scope 2 (purchased energy)               | 0                  | N/A – no company-operated premises; staff work from home   |
| Upstream transportation & distribution   | 0                  | N/A – software/AI services only, no physical goods         |
| Waste generated in operations            | 0                  | N/A – no company premises generating operational waste     |
| Business travel                          | ~0.14              | Applicable – estimated                                     |
| Employee commuting                       | 0                  | N/A – fully remote workforce, no commuting                 |
| Downstream transportation & distribution | 0                  | N/A – software/AI services only, no physical distribution  |

## Business travel breakdown (rail journeys to London, FY2025/26)

| Route                                                           | tCO <sub>2</sub> e | Basis     |
|-----------------------------------------------------------------|--------------------|-----------|
| Edinburgh <-> London (1 return trip/year, ~632 km one-way)      | 0.04               | Estimated |
| Hertfordshire <-> London (36 return trips/year, ~45 km one-way) | 0.1                | Estimated |

## Current emissions reporting

As this is Wholesum Tech Ltd's first year measuring emissions, the Reporting Year is the same as the Baseline Year.

|                        |                                          |
|------------------------|------------------------------------------|
| <b>Reporting Year:</b> | FY2025/26 (1 April 2025 – 31 March 2026) |
|------------------------|------------------------------------------|

## Reporting Year Emissions

| EMISSIONS                  | TOTAL (tCO <sub>2</sub> e) |
|----------------------------|----------------------------|
| Scope 1                    | 0                          |
| Scope 2                    | 0                          |
| Scope 3 (Included Sources) | 0.14                       |
| <b>Total Emissions</b>     | <b>0.14</b>                |

## Emissions reduction targets

Given Wholesum Tech Ltd's current baseline is very low (c. 0.14 tCO<sub>2</sub>e/year), driven almost entirely by occasional rail travel, our near-term target is to keep absolute emissions materially below the rate at which our headcount and revenue grow – i.e. to decouple emissions growth from business growth – while working toward the longer-term Net Zero commitments set out above.

We project that, even accounting for team growth, total annual emissions will remain below 2 tCO<sub>2</sub>e through FY2029/30, by continuing to operate remote-first, avoiding a vehicle fleet or office premises, and favouring rail over air travel and over-provisioned compute infrastructure.

We commit to reviewing this target annually as headcount grows and more granular data (e.g. cloud compute usage, any future office space) becomes available, and to formalising quantified interim reduction milestones once we have at least two years of measured data.

## Carbon reduction projects

### Completed carbon reduction initiatives

The following environmental management measures are already in place and will remain in effect when performing any NHS AI Healthcare Framework contract:

- Fully remote-first working model – no company offices or commuting-related emissions.
- Paperless operating practices across all business processes.
- LED lighting used in all home-working/equipment setups where applicable.
- Efficient AI/LLM usage policy – selecting the smallest appropriately-sized models for a task rather than defaulting to the largest reasoning models, reducing compute-related energy consumption.
- No company vehicle fleet; business travel defaults to rail rather than air or car.

### Future carbon reduction initiatives

As Wholesum Tech Ltd grows, we intend to review and adopt further measures, to be confirmed, which may include:

- Selecting cloud/compute providers with credible renewable energy commitments as usage scales.

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- Formalising a low-carbon travel policy as team size and client-facing travel increase.
- Introducing structured emissions tracking (e.g. cloud usage-based estimation) to replace manual estimates.

## Declaration and sign off

This Carbon Reduction Plan has been completed with reference to PPN 06/21 and the associated NHS Shared Business Services Carbon Reduction Plan Guidance (v1.2).

Emissions have been estimated with reference to the GHG Protocol Corporate Standard and UK Government emission conversion factors for greenhouse gas company reporting. Given Wholesum Tech Ltd's operating model (no premises, no fleet), Scope 1 and Scope 2 emissions are reported as nil; the required subset of Scope 3 emissions (business travel) has been estimated in accordance with the Corporate Value Chain (Scope 3) Standard.

This Carbon Reduction Plan has been reviewed and is intended to be signed off by the director below prior to publication.

|                                 |                                                                                    |
|---------------------------------|------------------------------------------------------------------------------------|
| Signed on behalf of the Bidder: |  |
|                                 | Emily Kucharski, Chief Executive Officer                                           |
| Date:                           | 7 <sup>th</sup> July 2026                                                          |