Carbon Reduction Plan
CompliMind Ltd

July 2026

CompliMind

Contents

1. Commitment to achieving Net Zero

CompliMind Ltd is committed to achieving Net Zero greenhouse gas emissions by 2045. We have aligned our target with the NHS goal of reaching Net Zero by 2045 across the emissions it influences, including those of its suppliers.

2. Baseline and Current Emissions Footprint

Baseline emissions are a record of the greenhouse gases produced prior to the introduction of any strategies to reduce emissions. They are the reference point against which future reductions are measured.

This is the first Carbon Reduction Plan for CompliMind and our first emissions footprint. With no prior reporting history, the period April 2025 to March 2026 serves as both our baseline and our current reporting year. All future reductions will be measured against it.

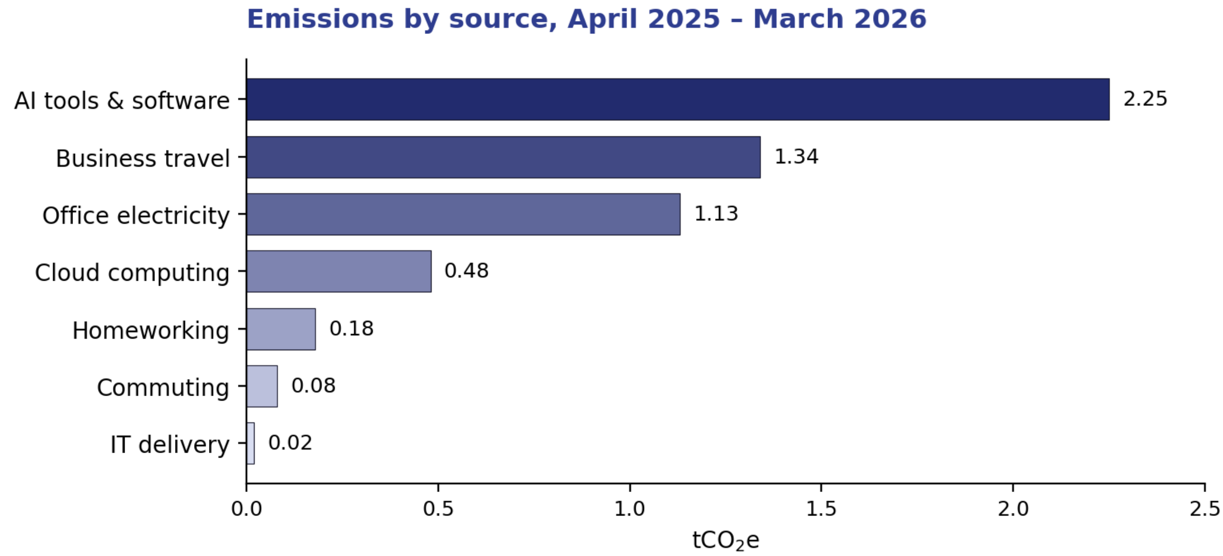
Emissions	Total (tCO_2e)
Scope 1	0.00
Scope 2	0.00
Scope 3 (included sources)	5.48
Total emissions	**5.48**

Additional details relating to the baseline emissions calculations

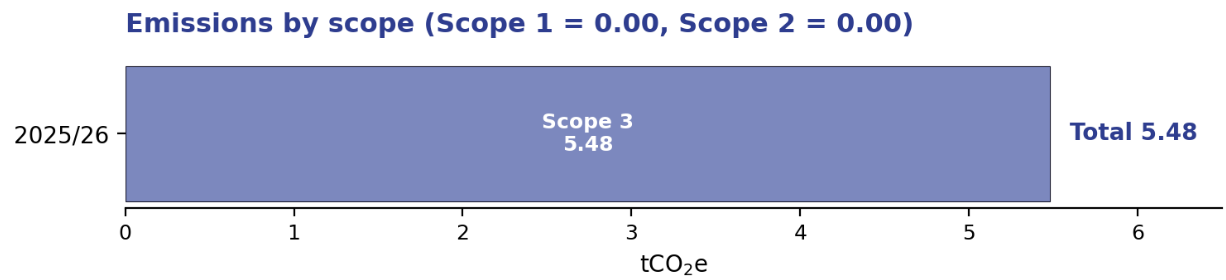
CompliMind is a remote-first company operating from shared co-working spaces. Headcount grew from 2 to approximately 8 people over the reporting period. We report no Scope 1 or Scope 2 emissions: we own no vehicles and do not purchase fuel, gas or electricity directly. The energy used in our co-working spaces is procured by the building operators, so under the GHG Protocol it is reported as an indirect (Scope 3) emission rather than Scope 2; the figure remains an estimate, as the spaces are not separately metered to us (see Methodology). People-related emissions (including commuting, homeworking and office energy) are based on an average headcount of around 5 across the period, reflecting our growth through the year. Cloud computing emissions are taken directly from our providers' emissions dashboards and are measured rather than estimated. Emissions from our AI tools and software subscriptions, including Claude and Cursor usage credits, are estimated from expenditure (see Methodology).

3. Emissions Breakdown

Our total footprint for the period was approximately 5.48 tCO_2e. The breakdown below shows where those emissions arise.



AI tools and software subscriptions (2.25 tCO_2e, 41%) and business travel (1.34 tCO_2e, 24%) together account for around two-thirds of the total, with office electricity (1.13 tCO_2e, 21%) the next largest source. Cloud computing accounts for approximately 0.48 tCO_2e (9%). Homeworking (0.18 tCO_2e), commuting (0.08 tCO_2e) and inbound IT deliveries (0.02 tCO_2e) make up the remainder.



Flights to Belfast account for approximately 0.56 tCO_2e, more than all of our travel to customer sites by rail combined, and the largest single travel activity in our footprint.

Scope 3 detail by category

- **Category 1: Purchased goods and services — AI tools and software (voluntary, spend-based):** ~2.25 tCO_2e. Usage credits and subscriptions for our AI tools (including Claude and Cursor) and wider software toolset, estimated from annual expenditure (see Methodology).
- **Category 4: Upstream transport & distribution:** ~0.02 tCO_2e. Limited to occasional delivery of IT equipment.
- **Category 5: Waste generated in operations:** Negligible and not separately metered, as waste in our shared co-working spaces is managed communally by the building operators.
- **Category 6: Business travel:** ~1.34 tCO_2e. UK rail travel to customer sites and between our offices (economy class), plus two return flights to Belfast.
- **Category 7: Employee commuting & homeworking:** ~0.26 tCO_2e combined (homeworking ~0.18; commuting ~0.08).
- **Category 8: Upstream leased assets — office electricity (voluntary):** ~1.13 tCO_2e. Estimated electricity use in our shared co-working spaces. As this energy is procured by the building operators rather than purchased directly by CompliMind, it is reported here rather than under Scope 2.
- **Category 9: Downstream transport & distribution:** Nil. Our software is delivered digitally, with no physical product or distribution.
- **Cloud computing (voluntary, beyond required scope):** ~0.48 tCO_2e. Microsoft Azure ~0.38 tCO_2e (location-based) and Google Cloud ~0.10 tCO_2e (market-based).

4. Methodology

This Carbon Reduction Plan has been prepared in accordance with the Greenhouse Gas (GHG) Protocol Corporate Standard and the Corporate Value Chain (Scope 3) Standard. Emissions have been calculated using the UK Government's 2025 greenhouse gas conversion factors for company reporting. Scope 1 and Scope 2 emissions follow Streamlined Energy and Carbon Reporting (SECR) conventions.

Measured, estimated and spend-based data: The basis of each figure is as follows:

- **Measured:** cloud computing emissions, taken directly from the Microsoft Azure and Google Cloud emissions dashboards.
- **Estimated:** office electricity, derived from occupied desk-days across our two co-working spaces and a standard office energy intensity, as the spaces are not separately metered to us; and business travel, commuting and homeworking, derived from typical journey distances, travel modes and remote-working patterns over the period. People-related figures use an average headcount of approximately 5, reflecting growth from 2 to around 8 staff during the year.
- **Spend-based:** AI tools and software subscriptions, calculated by applying the US EPA Supply Chain GHG Emission Factor for software publishers (v1.3, 0.08 $kgCO_2e$ per US dollar, cradle-to-shelf) to our annual expenditure on software and AI tooling,

converted to US dollars. This is a conservative screening estimate: it covers our full software subscription spend, including Claude and Cursor usage credits, and we will refine it with supplier-specific emissions data where providers publish it.

Scope 2 classification:

We purchase no electricity, heat or steam directly. Energy used in our shared co-working spaces is procured and paid for by the building operators, so under the GHG Protocol Corporate Standard these are indirect emissions, reported within Scope 3 (Category 8: upstream leased assets) rather than Scope 2.

Cloud reporting basis:

Azure emissions are reported on a location-based basis and Google Cloud emissions on a market-based basis. Both cloud figures cover the closest available 12-month window from each provider's dashboard (May 2025 to April 2026), which differs from our reporting period by approximately one month. All purchased cloud services are accounted for within CompliMind's Scope 3 emissions.

5. Scope Inclusions and Exclusions

Included: Scope 1 (assessed as nil); Scope 2 (assessed as nil, as we purchase no energy directly); and the required Scope 3 categories 4, 5, 6, 7 and 9. On a voluntary basis we also report Scope 3 Category 1 (AI tools and software subscriptions), Category 8 (office electricity in shared co-working spaces) and cloud computing emissions. Although these fall outside the Scope 3 categories currently required under PPN 006, they are material to an AI company, and we have chosen to measure and disclose them.

Excluded or assessed as nil: Scope 1 is nil as we own no vehicles (our only company vehicle is a bicycle) and pay for no on-site fuel or gas. Scope 2 is nil as we purchase no electricity, heat or steam directly. Category 9 (downstream transport) is nil, as our product is delivered entirely digitally. Category 5 (waste) is treated as negligible given our shared co-working arrangements.

6. Emissions Reduction Targets

CompliMind commits to reaching Net Zero greenhouse gas emissions by 2045, supported by the interim measures set out below.

As we grow, we expect absolute emissions, particularly from cloud computing and AI tooling, to rise with our headcount and customer base. Our focus is on reducing the emissions within our direct control and improving our carbon efficiency as we scale. We will aim to introduce an emissions-intensity metric (for example, tCO_2e per employee) in our next Carbon Reduction Plan, once headcount has stabilised, and report it alongside our absolute emissions thereafter.

Our commitments are:

- Reach Net Zero by 2045, in line with the NHS's supplier-emissions ambition.

- Reduce emissions from business travel by defaulting to rail for UK journeys, using virtual meetings where they achieve the same outcome, and reviewing each proposed flight against a lower-carbon alternative before booking.
- Hold cloud workloads in efficient, low-carbon data-centre regions and monitor cloud emissions through our providers' dashboards.
- Review our AI and software tooling annually, consolidating overlapping tools and preferring providers that publish emissions data, so that spend-based estimates can be replaced with supplier-specific figures over time.
- Establish an emissions-intensity baseline in our next plan and track efficiency against it.

7. Carbon Reduction Projects

CompliMind is certified to ISO 14001, the international standard for environmental management systems. The measures set out in this plan operate within that framework rather than in isolation: our environmental aspects and impacts are identified, monitored and reviewed on a defined cycle, with objectives set and progress audited against them. Certification commits us to continual improvement of our environmental performance, which underpins the reduction targets and initiatives described in this plan.

Actions taken to date:

The following measures were adopted from the outset and are in effect:

- Adopted a remote-first operating model, avoiding a permanent full-size office and the associated energy and commuting emissions. Office use is limited to shared co-working space used part-time.
- Standardised on refurbished hardware for company devices, with the aim of keeping equipment in service for four years or more, and disposing of end-of-life equipment in accordance with WEEE regulations.
- Established low-carbon commuting: office-based staff cycle, walk or use public transport, with no car commuting.
- Set a virtual-first default for meetings, reserving travel for occasions where on-site presence is necessary, particularly in estates and facilities work, and using economy-class rail for UK journeys.
- Selected cloud providers and regions with strong renewable-energy commitments, hosting primarily in UK and EU data centres, with emissions monitoring enabled through both providers' reporting tools.

Planned future initiatives:

As the company grows, we intend to:

- Introduce a formal low-carbon travel policy for the flight-review approach above.
- Develop sustainable-procurement criteria, including environmental questions at supplier onboarding.

- Establish and report an emissions-intensity metric.
- Keep our cloud architecture under review to manage and, where practical, reduce its carbon intensity as usage grows.
- Request emissions data from our AI tool providers as it becomes available, to move from spend-based to supplier-specific reporting.

8. Wider Contribution to NHS Net Zero

Beyond our own footprint, CompliMind's product helps NHS customers progress towards their sustainability and Net Zero goals. The contribution described here relates to emissions reductions achieved by our customers and, consistent with the GHG Protocol, is not counted within CompliMind's own footprint reported above.

CompliMind supports NHS organisations in several ways: helping them find and navigate relevant sustainability guidance and supporting documentation; supporting the production and improvement of their Green Plans and similar materials; and helping them track delivery through assurance tracking, dashboards and insights.

9. Declaration and Sign Off

This Carbon Reduction Plan has been completed in accordance with PPN 006 and the associated guidance and reporting standard for Carbon Reduction Plans, and with the requirements of the NHS Net Zero Supplier Roadmap.

Emissions have been reported and recorded in accordance with the published reporting standard for Carbon Reduction Plans and the GHG Protocol Corporate Standard, and use 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 where applicable, 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 CompliMind Ltd.

Signed on behalf of CompliMind Ltd:

Name: Dr Carl-Magnus von Behr, Co-Founder & CEO

Date: July 2026