

Carbon Reduction Plan

Supplier name: Steer Group Ltd

Publication date: October 2023

Commitment to achieving Net Zero

Recognising the urgency and magnitude of the global climate crisis, Steer is committed to achieving Net Zero greenhouse gas (GHG) emissions.

Our Net Zero Carbon target is 25 years ahead of the 2050 target set out in the standard Carbon Reduction Plan requirements. Steer's Net Zero Carbon target is set at a group level and applies to our operations globally.

Steer supports the UN Sustainable Development Goals and the Paris Agreement to reduce greenhouse gas (GHG) emissions. We are also signatories to the UN Global Compact. Steer is continually strengthening our environmental policies and practices, which address reducing GHG emissions, waste, and energy usage across our operations globally.

This Carbon Reduction Plan conforms to the requirements of UK Procurement Policy Note PPN06/21.

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 our Net Zero Carbon Policy related strategies to reduce emissions.

Steer began collecting emissions data for UK Operations only in accordance with the Streamlined Energy and Carbon Reporting (SECR) requirement for our financial year ending 31 March 2020. In accordance with these requirements, we have reported scope 1, scope 2 and scope 3 (business travel) emissions for two reporting years and have used the first of these years as our initial baseline.

Steer completed its first year of Global Operations GHG emissions reporting of scope 1, scope 2 and scope 3 for FY22.

FY22 is being used as the new baseline and reference point from which all further emissions reductions targets and performance will be measured.

Baseline Year: 01 April 2019 to 31 March 2020 (FY20)	
Additional Details relating to the Baseline Emissions calculations.	
Organisational Boundary: UK Operations The emissions for FY20 below represent the initial baseline used to set reduction targets and initiatives in the Carbon Reduction Plan. FY20 emissions were independently reviewed and verified in accordance with UK Government GHG Conversion Factors for Company Reporting as part of the requirement for Streamlined Energy and Carbon Reporting (SECR).	
EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	
Natural Gas	100.93

Company vehicles	Steer do not have company vehicles so this category is not applicable for reporting.
Scope 2	
Grid Electricity	111.25
Scope 3	
Upstream:	
Purchased goods and services	Calculations excluded as data is not available for FY20 or FY21. Steer has since developed our data sourcing and methodology to include this data for FY22 onwards.
Capital goods	Calculations excluded as data is not available for FY20 or FY21. Steer has since developed our data sourcing and methodology to include this data for FY22 onwards.
Fuel and energy related materials	Not material
Upstream transportation and distribution	Not relevant. Steer does not sell or transport products
Waste generated by operations	Calculations excluded as data is not available for FY20 or FY21. Steer has since developed our data sourcing and methodology to include this data for FY22 onwards.
Business travel	814.00
Employee commuting	Calculations excluded as data is not available for FY20 or FY21. Steer have since developed our data sourcing and methodology to include this data for FY22 onwards.
Upstream leased assets	Steer does not operate leased assets so this category is not applicable for reporting.
Downstream:	
Downstream transport and distribution	Steer does not sell physical products to customers (only services) so this category is not applicable for reporting.
Processing of sold products	Steer do not operate in a manufacturing supply chain so this category is not applicable for reporting.
Use of sold products	The Environmental impact of services provided by Steer is already being accounted for within existing reporting categories.
End of life treatment of sold products	Steer does not sell physical products to customers (only services) so this category is not applicable for reporting.
Downstream leased assets	Steer does not operate leased assets so this category is not applicable for reporting.
Franchises	Steer does not operate franchises so this category is not applicable for reporting.
Investments	Steer does not operate investments so this category is not applicable for reporting.
Total Gross Emissions (UK)	1026.18

Reporting Year: 01 April 2020 to 31 March 2021 (FY21)

Additional Details relating to the Baseline Emissions calculations.

Organisational Boundary: UK Operations

FY21 emissions were independently reviewed and verified in accordance with UK Government GHG Conversion Factors for Company Reporting as part of the requirement for Streamlined Energy and Carbon Reporting (SECR).

EMISSIONS	TOTAL (tCO₂e)
Scope 1	
Natural Gas	71.23
Company vehicles	Steer do not have company vehicles so this category is not applicable for reporting.
Scope 2	
Grid Electricity	65.39
Scope	
Upstream:	
Purchased goods and services	Calculations excluded as data is not available for FY20 or FY21. Steer has since developed our data sourcing and methodology to include this data for FY22 onwards.
Capital goods	Calculations excluded as data is not available for FY20 or FY21. Steer has since developed our data sourcing and methodology to include this data for FY22 onwards.
Fuel and energy related materials	Not material
Upstream transportation and distribution	Not relevant. Steer does not sell or transport products
Waste generated by operations	Calculations excluded as data is not available for FY20 or FY21. Steer have since developed our data sourcing and methodology to include this data for FY22 onwards.
Business travel	2.47
Employee commuting	Calculations excluded as data is not available for FY20 or FY21. Steer have since developed our data sourcing and methodology to include this data for FY22 onwards.
Upstream leased assets	Steer does not operate leased assets so this category is not applicable for reporting.
Downstream:	
Downstream transport and distribution	Steer does not sell physical products to customers (only services) so this category is not applicable for reporting.
Processing of sold products	Steer do not operate in a manufacturing supply chain so this category is not applicable for reporting.
Use of sold products	The Environmental impact of services provided by Steer is already being accounted for within existing reporting categories.
End of life treatment of sold products	Steer does not sell physical products to customers (only services) so this category is not applicable for reporting.
Downstream leased assets	Steer does not operate leased assets so this category is not applicable for reporting.

Franchises	Steer does not operate franchises so this category is not applicable for reporting.
Investments	Steer does not operate investments so this category is not applicable for reporting.
Total Gross Emissions (UK)	139.09

Reporting Year: 01 April 2021 to 31 March 2022 (FY22)	
Additional Details relating to emissions calculations.	
Organisational Boundary: Global Operations FY22 emissions were independently reviewed and verified in accordance with ISO 14064 Part 3 (2018) and GHG Emissions Protocol Standards.	
EMISSIONS	TOTAL (tCO₂e)
Scope 1	
Natural Gas	88.23
Company vehicles	Steer do not have company vehicles so this category is not applicable for reporting.
Scope 2	
Grid Electricity	186.49
Scope 3	
Upstream:	
Purchased goods and services	768.34
Capital goods	Reported in the PG&S calculation
Fuel and energy related materials	Not material
Upstream transportation and distribution	Not relevant. Steer does not sell or transport products
Waste generated by operations	Reported in 'Purchased Goods & Services' calculations
Business travel	217.40
Employee commuting	1.00
Upstream leased assets	Steer does not operate leased assets so this category is not applicable for reporting.
Downstream:	
Downstream transport and distribution	Steer does not sell physical products to customers (only services) so this category is not applicable for reporting.
Processing of sold products	Steer do not operate in a manufacturing supply chain so this category is not applicable for reporting.
Use of sold products	The Environmental impact of services provided by Steer is already being accounted for within existing reporting categories.
End of life treatment of sold products	Steer does not sell physical products to customers (only services) so this category is not applicable for reporting.
Downstream leased assets	Steer does not operate leased assets so this category is not applicable for reporting.

Franchises	Steer does not operate franchises so this category is not applicable for reporting.
Investments	Steer does not operate investments so this category is not applicable for reporting.
Total Gross Emissions (Global)	1261.46

Reporting Year: 01 April 2022 to 31 March 2023 (FY23)

Additional Details relating to the emissions calculations.

Organisational Boundary: Global Operations
 FY23 emissions calculations have been conducted using Steer supplied activity data and multiplied by the relevant emissions factors from published and reputable sources, most commonly used – UK Government Conversion Factors for Company Reporting (Year 2022, Expiry: 08/06/2023, Version 2.0) – DBEIS / DEFRA.
 FY23 emissions reporting has been carried out in accordance with ISO 14064:1-2018 and GHG Emissions Protocol Accounting and Reporting Standards, and the Greenhouse Gas Protocol - Corporate Accounting and Reporting Standard.

EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	
Mains Gas	26.99
Company owned / leased vehicles	Steer do not have company vehicles that are reportable within this category.
Refrigerant gas loss recharge	13.13
Scope 2	
Energy use on site	100.82
Electric vehicle energy usage	0.58
Steam	42.52
Scope 3	
Upstream:	
Purchased goods	12.36
Purchased services	122.84
Transmission & distribution losses	2.29
Well to Tank	79.35
Upstream transportation and distribution	Not relevant. Steer does not sell or transport products
Waste generated by operations	44.18
Business travel (not using owned/leased Vehicles)	359.72
Business hotel or event activities	46.03
Employee commuting (not using owned/leased Vehicles)	248.77
Energy usage Working from Home	148.06

Upstream leased assets	Steer does not operate leased assets so this category is not applicable for reporting.
Downstream:	
Downstream transport and distribution	Steer does not sell physical products to customers (only services) so this category is not applicable for reporting.
Processing of sold products	Steer do not operate in a manufacturing supply chain so this category is not applicable for reporting.
Use of sold products	The Environmental impact of services provided by Steer is already being accounted for within existing reporting categories.
End of life treatment of sold products	Steer does not sell physical products to customers (only services) so this category is not applicable for reporting.
Downstream leased assets	Steer does not operate leased assets so this category is not applicable for reporting.
Franchises	Steer does not operate franchises so this category is not applicable for reporting.
Investments	Steer does not operate investments so this category is not applicable for reporting.
Total Gross Emissions (Global)	1247.63

Carbon Neutral Status

In October 2023, Steer Group Limited maintained its carbon neutral status. Certified by Carbon Neutral Britain, carbon neutral status has been awarded to Steer for a period of 12 months.

As certification is awarded by an external organisation, it provides assurance that the carbon neutral claim is robust and credible, following calculation using the ISO 14064 and GHG Protocol Emissions Standard principles of relevance, completeness, consistency, transparency, and accuracy.

Through the Carbon Neutral Britain Woodland Fund™, Steer Group Limited has offset its total carbon emissions 1247tCO₂e through internationally certified carbon offsetting projects.

Emissions reduction targets

In addition to carbon offsetting and carbon neutral status, which was first achieved in 2022, Steer is committed to taking further action to reduce its future emissions.

As part of our Carbon Reduction Strategy, in March 2022 our London office moved to a new BREEAM Excellent rated Building. This has been the main contributing factor in achieving a 69% reduction in Scope 1 and 2 location-based emissions in FY23 compared to the FY22 Global baseline.

We achieved a 1% absolute reduction in Scope 3 emissions compared to the FY22 Global baseline despite widening our scope of reporting and an increase in FTE's.

This is equal to an intensity ratio reduction of 17% (tCO₂e/FTE) in FY23 for Scope 1,2 and 3 emissions compared to the FY22 Global baseline and a 41% (tCO₂e/FTE) reduction since our first year of reporting in FY20.

Our current strategy is to continue to minimise all emissions by 2025, after which we will offset all residual emissions so that our footprint is defined by this PPN as zero. We have a Net Zero target date of 2025.

Steer will continue to review and implement further reductions which will be in alignment with science-based targets (SBTi's) to ensure our business is aligned with the Paris Agreement's less than 1.5°C scenario.

Steer will continue to review and report on GHG emissions performance taking into consideration both absolute reductions as well as intensity values (tCO₂e/FTE or other metric), to further track and implement reduction strategies.

Carbon Reduction Projects

Completed Carbon Reduction Initiatives

The following environmental management measures have been completed or implemented since our original FY20 baseline.

All carbon reduction measures will remain in effect when performing the contract.

Governance, Oversight and Advisory

- Our Carbon Reduction Plan is a component part of Environmental Management System which is ISO 14001 Certified. The Chief Operating Officer (COO) is accountable for delivery and reports and publishes progress to the Board, Shareholders and Trustees on a quarterly basis.
- Carbon emissions are calculated within the Steer Carbon Emission Calculation Framework (SCECF) for Scope 1,2&3 and calculations are audited.
- The Steer Sustainability Working Group, chaired by the COO, provides technical advice to the Board and owners of Local Environmental Action Plans on the implementation of carbon reduction measures.
- Steer is signatory to the UN Global Compact.
- We internally funded an R&I project in 2021 to evaluate energy usage a from home working versus office working which were used internally to demonstrate the energy efficiency of office working.
- We have invested in certified Gold Standard offsets to achieve carbon neutrality across our residual global scope 1, 2 and 3 emissions each year.

Property and Energy Use

- As part of our annual business planning process each office is required to sets a Local Environmental Action Plans to identify specific local carbon reduction measures. These are embedded in management balanced scorecards and impact assessed through the SCECF.
- As part of our annual business planning process, we review our property portfolio to identify carbon reduction initiatives for existing offices and establish energy efficiency initiatives for new offices. As an example, our new London office (opened May 2022) has a BREEAM rating of 'Excellent' in the top 10% of sustainable buildings), it has an EPC A rating and is 100% renewable energy powered.

Travel and Suppliers

- All Steer offices support active travel and are located at or near to public transport hubs.
- Steer operates a Travel Hierarchy to support the use of digital connectivity and the use of sustainable transport.
- In 2021 Steer introduced a global staff travel survey to assist with development and delivery of more sustainable commuting choices. In 2023 this survey was expanded to include working from home and commuting which we are using to increase our scope 3 emissions reporting.
- Steer Sustainable and Responsible Procurement Policies requires our suppliers to align with our Statement of Sustainability Principles.

Waste Reduction and Recycling

- All Steer offices operate multiple recycling points for office recycling and apply a waste hierarchy.
- We have introduced a traceable donation policy with respect to office furniture equipment.
- We seek to reduce waste at source by working with suppliers that specialize in re-conditioned items such as office furniture.

Completed Carbon Reduction Initiatives FY23

The following environmental management measures were implemented for the period 1st April 2022 - 31st March 2023.

- We extended our Environmental Management System which is ISO 14001 Certified to our North America offices with a target of having 3no. additional offices certified.
- We undertook a detailed Scope 3 emissions calculations assessment and are delivering a program of initiatives to improve the accuracy of our carbon emissions.
- We extended our Sustainable and Responsible Procurement Policies to all North America offices.
- We have designed office specific travel planning guidance and have progressed on development of a Travel Hierarchy tool which will be used to inform on sustainable travel option for business travel, and the record trip data for use in GHG emissions reporting.
- We continued to expand our recycling offer by working with landlords, other tenants, and our suppliers. In FY22 this including introducing a soft plastics recycling in our London office.
- We completed our Toronto office fit out using a mix of new and reconditioned furniture.

Planned Carbon Reduction Initiatives FY24

The following environmental management measures are planned or under consideration for the period 1st April 2023 - 31st March 2024;

- Continue to improve our processes to maximise accuracy of reporting.
- Engage and influence our Landlords and Building Managers to increase use of renewable energy sources and improve the energy efficiency of their buildings.
- Engage with key suppliers to identify the reduction potential for supply-chain related emissions.
- Engage with employees to identify ways to facilitate more sustainable business travel and commuting.
- Identify opportunities to increase the proportion of total supply chain spend (office running costs) that is with SME's and local businesses.
- Seek ways to further reduce waste at source by using reconditioned office furniture and equipment where appropriate and encourage principles of "reduce, reuse, recycle (or compost)".
- Continue to set and report against carbon reductions targets that will support Steer in achieving its Net Zero Carbon goal.

Declaration and Sign Off

This Carbon Reduction Plan has been completed in accordance with PPN 06/21 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 standard¹ and uses the appropriate Government emission conversion factors for greenhouse gas company reporting² and applies the ISO 14064:1-2018 specification and guidance at the organisational level for quantification and reporting of greenhouse gas emissions and removals³.

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) Standard⁴.

This Carbon Reduction Plan has been reviewed and signed off by the Steer board of directors.



Sharon Daly
Chief Operating Officer
Steer

23 October 2023

Steer is the brand under which Steer Davies & Gleave Limited, Amberside Advisors Limited and Fourth Economy operate.

¹ <https://ghgprotocol.org/corporate-standard>

² <https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>

³ Available from [iso.org](https://www.iso.org) Greenhouse gases – Part 1: Specification with guidance at the organisational level for quantification and reporting of greenhouse gas emissions and removals

⁴ <https://ghgprotocol.org/standards/scope-3-standard>