

ADAS3D MEDICAL
CARBON REDUCTION PLAN 2025

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1. COMMITMENT TO ACHIEVING NET ZERO

ADAS3D MEDICAL is committed to achieving Net Zero greenhouse gas (GHG) emissions across its operations by 2050, in support of the UK Government's Net Zero strategy and in accordance with the requirements of Procurement Policy Note (PPN) 06/21.

As a manufacturer of regulated Software as a Medical Device (SaMD), the company recognises that environmental sustainability is an integral part of responsible business management. Although our operational carbon footprint is significantly lower than that of traditional manufacturing organisations, we acknowledge our responsibility to continually reduce greenhouse gas emissions associated with our facilities, information technology infrastructure, cloud services, business travel, procurement activities and employee commuting.

Our carbon reduction strategy is based on continuous improvement, responsible resource management and evidence-based decision-making. We are committed to monitoring our emissions annually, identifying opportunities for improvement and implementing practical measures that contribute to our long-term Net Zero objective while maintaining the highest standards of product quality, patient safety and regulatory compliance.

This Carbon Reduction Plan establishes our baseline emissions, outlines our current greenhouse gas emissions profile and describes the actions that will support our transition towards Net Zero by 2050.

2. ORGANISATION OVERVIEW

ADAS3D MEDICAL is a medical device company headquartered in Barcelona, Spain, specialising in the development, validation, maintenance and support of Software as a Medical Device (SaMD) solutions for healthcare professionals and healthcare organisations worldwide.

The company develops regulated software in accordance with internationally recognised quality and regulatory requirements, including ISO 13485 Quality Management System.

The company's products have also obtained regulatory approvals in several international markets, including:

- UKCA (United Kingdom);
- FDA 510(k) (United States);
- TGA (Australia);
- ANVISA (Brazil);
- Medical Device Licence (Canada);
- NMPA (China);
- MHLW (Japan).

These regulatory frameworks require robust software development, validation and cybersecurity processes, supported by dedicated computing infrastructure and secure cloud services.

During the reporting period, from January to December 2025, the company employed 26 people and operated from a 400 m² office located in Barcelona.

The organisation follows a hybrid working model, with employees typically working three days per week in the office and two days remotely, helping to reduce commuting-related emissions while maintaining effective collaboration and operational efficiency.

The company does not own or operate manufacturing facilities for physical medical devices and does not operate a fleet of company vehicles. Consequently, its principal greenhouse gas emission sources relate to electricity consumption, information technology infrastructure, cloud services, business travel and employee commuting.

3. REPORTING METHODOLOGY

The organisational boundary for this Carbon Reduction Plan follows the operational control approach, covering all activities over which the company exercises operational control.

The reporting period is: 1 January 2025 – 31 December 2025

Unless otherwise stated, emissions are reported in tonnes of carbon dioxide equivalent (tCO₂e).

Where primary emissions data were unavailable, reasonable estimates have been developed using recognised greenhouse gas accounting methodologies, UK Government emission conversion factors (DESNZ), and, for overseas electricity, the officially published national grid factor (CNMC), in line with UK Government guidance.

ADAS3D MEDICAL is committed to improving the quality and completeness of emissions data over time through enhanced monitoring and supplier engagement.

4. BASELINE EMISSIONS FOOTPRINT

4.1. Baseline Year

Reporting Year / Baseline Year: 2025

This Carbon Reduction Plan represents the company's first formal greenhouse gas inventory prepared in accordance with the requirements of PPN 006.

As no previous carbon footprint had been prepared using the GHG Protocol methodology, the reporting period from 1 January 2025 to 31 December 2025 has been adopted as both the Baseline Year and the Current Reporting Year.

Future Carbon Reduction Plans will use this baseline to measure year-on-year progress towards the Company's Net Zero commitment.

4.2. Operational Profile

During the reporting period the company operated:

- One office facility (400 m²) located in Barcelona, Spain.
- 26 employees operating under a hybrid working model.
- Approximately 45.000 kWh of purchased electricity.
- A dedicated technical server room operating continuously (24 hours every day).
- On-premises validation, testing and development servers.
- AWS cloud infrastructure supporting customer-facing services, software development and secure hosting.
- Google Workspace cloud productivity services.
- High-performance engineering workstations used for software development, testing and artificial intelligence activities.
- International business travel supporting regulatory, commercial and customer activities.

The company does not own company vehicles and does not use fossil fuels for heating within the reporting boundary.

4.3. Baseline Emissions

As this is the company's first Carbon Reduction Plan prepared under PPN 006, the emissions presented within this document represent both the baseline and the current reporting year.

The company's principal emission sources are expected to comprise:

- Purchased electricity (Scope 2);
- Business travel (Scope 3);
- Employee commuting (Scope 3);
- Information technology equipment and supporting digital infrastructure (Scope 3);
- Cloud computing services (Scope 3).

Direct emissions (Scope 1) are expected to be minimal due to the absence of company-owned vehicles and direct fuel combustion activities.

The quantified greenhouse gas emissions for each reporting scope are presented in the following section of this Carbon Reduction Plan.

5. CURRENT EMISSIONS REPORTING

Reporting Year: 2025

The reporting period covers the company's operational activities between 1 January 2025 and 31 December 2025.

Greenhouse gas emissions have been calculated using activity data provided by the Company and the UK Government Greenhouse Gas Conversion Factors (DESNZ), following the Greenhouse Gas Protocol Corporate Standard.

The Company has adopted the operational control approach when defining its reporting boundary.

5.1. SCOPE 1 EMISSIONS

Scope 1 emissions include direct greenhouse gas emissions from sources owned or controlled by the company.

During the reporting period, ADAS3D MEDICAL:

- Did not own or operate company vehicles;
- Did not consume natural gas or other fossil fuels within the office;
- Did not operate combustion equipment within the reporting boundary;
- Had no identified material sources of direct greenhouse gas emissions.

Accordingly, ADAS3D MEDICAL reported Scope 1 emissions for the reporting period are:

Total Scope 1 emissions = 0,00 tCO₂e

5.2. SCOPE 2 EMISSIONS

Scope 2 emissions arise from purchased electricity consumed within the company's office and technical infrastructure.

During 2025 ADAS3D MEDICAL occupied a single office located in Barcelona with an approximate floor area of 400 m².

The office includes:

- Administrative workspaces;
- Software development workstations;
- Quality assurance and validation environments;

- Networking equipment;
- Dedicated technical server room;

Annual electricity consumption for the reporting period was **45.000 kWh**.

Electricity represents one of the company's principal operational emission sources due to the continuous operation of technical infrastructure and development equipment. The company currently purchases electricity only and does not consume natural gas within its operational boundary.

Scope 2 emissions were calculated using the official electricity emission factor published by Spanish National Commission on Markets and Competition (CNMC) (0,283 kgCO₂e/kWh) as follows:

Total Scope 2 emissions: 45.000 kWh × 0,283 kgCO₂e/kWh = 12.735 kgCO₂e = 12,74 tCO₂e

5.3. SCOPE 3 EMISSIONS

Although the company has relatively limited direct emissions, several indirect activities contribute to its organisational carbon footprint.

The following Scope 3 categories have been considered relevant to the company's operations.

5.3.1. Business Travel

Business travel represents one of the most significant indirect emission sources due to the company's international commercial, regulatory and customer support activities.

Business travel undertaken during 2025 included international and domestic journeys by air and rail.

Recorded business travel included:

BUSINESS TRAVEL	Transport	Origin	Destination	Days	Travellers	Estimated Distance (km)	Emission Factor (kgCO ₂ e)	Emissions (kgCO ₂ e)	Emissions (tCO ₂ e)
Business Travel 1	Air	Barcelona, Spain	Boston, USA	3	1	13.400	0,10916	1.462,74	1,463
Business Travel 2	Air	Barcelona, Spain	Chicago, USA	4	4	11.760	0,10916	5.134,89	5,135
Business Travel 3	Air	Barcelona, Spain	Philadelphia, USA	2	2	12.800	0,10916	2.794,50	2,795
Business Travel 4	Air	Barcelona, Spain	Scottsdale, USA	3	1	17.400	0,10916	1.899,38	1,899
Business Travel 5	Air	Barcelona, Spain	Paris, France	3	6	1.660	0,10916	1.087,23	1,087
Business Travel 6	Air	Barcelona, Spain	Paris, France	3	2	1.660	0,10916	362,41	0,362
Business Travel 7	Air	Barcelona, Spain	Yokohama, Japan	4	2	20.800	0,10916	4.540,86	4,541
Business Travel 8	Rail	Barcelona, Spain	Cordoba, Spain	3	2	1.700	0,03092	105,128	0,105128
Business Travel 9	Public transport	Barcelona, Spain	Barcelona, Spain	3	1	15	0,02121	0,31815	0,00031815
TOTAL EMISSIONS								17.387,46	17,3874

The total emissions for each business travel were calculated using the factor specified in the *Conversion factors 2026: full set* Excel.

The company recognises that international travel is an important contributor to its overall carbon footprint and intends to continue reducing unnecessary travel through increased use of virtual meetings where appropriate.

5.3.2. Employee Commuting

The company operates a hybrid working policy whereby employees generally attend the office three days per week and work remotely two days per week.

Employee commuting therefore represents a reduced source of emissions compared with a fully office-based working model.

Based on information provided by ADAS3D MEDICAL employees:

- Most employees commute using public transport;
- A smaller proportion travel by motorcycle;
- A limited number commute by private car.

Transport Mode	Employees	Average Round Trip Distance (km/day)	Working Days	Passenger-km / Vehicle-km	Emission Factor (kgCO ₂ e/km)	Emissions (tCO ₂ e)
Passenger Car	3	30	230	20.700	0,17209	3,562
Motorcycle	1	30	230	6.900	0,10108	0,697
Public Transport (Light Rail & Tram)	22	30	230	151.800	0,02121	3,220
Total Employee Commuting	26				Total Emissions (tCO₂e)	7,479

5.3.3. Information Technology Equipment

As a Software as a Medical Device developer, the company relies heavily on digital infrastructure.

The principal categories of IT assets include:

- Employee laptops and engineering workstations;
- High-performance graphics workstations;
- Software testing equipment;
- Physical servers;
- Network attached storage;
- Networking equipment;
- Monitors and peripherals.

During the reporting period the company operated approximately:

- 26 employee laptops;
- 18 desktop workstations;
- 32 monitors;
- Multiple physical servers operating continuously (24 hours per day);
- Dedicated testing and validation servers;
- GPU servers supporting artificial intelligence and software development;
- Secure network infrastructure.

Embodied carbon associated with IT equipment has not been quantified in this Carbon Reduction Plan due to the absence of verified lifecycle assessment (LCA) data for the company's specific assets. The company intends to incorporate this category into future reporting periods as verified supplier or third-party LCA data become available.

5.3.4. Cloud Computing Services

The company uses cloud infrastructure to support software development, secure hosting, customer services and business continuity.

Principal cloud providers include:

- Amazon Web Services (AWS);
- Google Workspace.

The company intends to improve the quality of cloud-related emissions data through future engagement with cloud service providers.

Cloud computing emissions have not been directly calculated within this reporting period. Future reporting will utilize the AWS Customer Carbon Footprint Tool and equivalent supplier reporting where available to quantify cloud-related greenhouse gas emissions.

5.3.5. Waste Generated in Operations

The company's activities generate relatively low quantities of operational waste.

Waste primarily consists of:

- Office waste;
- Electronic equipment at end of life;
- Printer consumables.

Electronic waste is managed through authorized recycling and disposal channels whenever equipment reaches the end of its useful life.

Quantitative waste data were not available for the reporting period, as waste management is currently handled through municipal and third-party recycling services without itemised volume reporting back to the company. Given the nature of the company's activities as a software developer, waste-related emissions are expected to represent an immaterial proportion of the organisation's total footprint. ADAS3D MEDICAL intends to request volume data from its waste management providers in future reporting periods to enable quantification.

5.3.6 Upstream and Downstream Transportation and Distribution

ADAS3D MEDICAL does not manufacture, distribute, or transport physical goods. The company's products are delivered exclusively as software. Accordingly, upstream and downstream transportation and distribution have been assessed as not material to the organisation's operations and are not included as a quantified emissions source within this Carbon Reduction Plan.

5.4. EMISSIONS SUMMARY

EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	0,00
Scope 2	12,74
Scope 3	24,87
Total Emissions	37,61

6. EMISSIONS PROFILE

Based on the company's operational characteristics, the principal contributors to greenhouse gas emissions during the reporting period were:

Quantified emission sources:

- Business travel
- Purchased electricity
- Employee commuting

Emission sources identified but not yet quantified in this reporting period:

- Information technology equipment (embodied carbon)
- Cloud computing services

The company intends to incorporate quantified data for information technology equipment and cloud computing services into future Carbon Reduction Plans as verified lifecycle assessment data and supplier-specific carbon reporting become available (see sections 5.3.3 and 5.3.4).

This emissions profile is consistent with that of a technology-based Software as a Medical Device organisation operating without manufacturing facilities or company-owned vehicle fleets.

The emissions inventory presented in this Carbon Reduction Plan establishes the company's baseline against which future carbon reduction performance will be measured.

7. EMISSIONS REDUCTION TARGETS

As this Carbon Reduction Plan establishes the company's first organisational greenhouse gas inventory, the reporting year 2025 has been adopted as the baseline against which future performance will be measured.

The company is committed to achieving continual improvement in environmental performance through practical, measurable and evidence-based carbon reduction initiatives.

Recognising the nature of its operations as a Software as a Medical Device (SaMD) developer, the company has established the following long-term objectives:

- Achieve Net Zero greenhouse gas emissions by 2050.
- Reduce operational greenhouse gas emissions through continual improvements in energy efficiency.
- Reduce avoidable business travel emissions while maintaining customer support and regulatory activities.
- Improve the quality and completeness of greenhouse gas data year-on-year.
- Increase the consideration of environmental performance within procurement activities.
- Promote sustainable commuting and hybrid working practices.

7.1. Interim Carbon Reduction Targets

The company has established the following indicative milestones:

Target Year	Objective
2026	Complete annual carbon footprint review and improve data quality for all Scope 3 categories.
2028	Reduce business travel emissions per employee through increased use of remote collaboration technologies where appropriate.
2030	Achieve a measurable reduction in total 10rganizational greenhouse gas emissions compared with the 2025 baseline through operational efficiencies and improved energy management.

2040	Continue progressive reductions across operational and value chain emissions while engaging suppliers on sustainability performance.
2050	Achieve Net Zero greenhouse gas emissions.

As future reporting periods provide increasingly accurate activity data, the company intends to establish quantified medium-term reduction targets supported by annual performance reviews.

Progress against these targets will be reviewed annually by top management.

8. CARBON REDUCTION PROJECTS

Although this Carbon Reduction Plan represents ADAS3D MEDICAL's first formal greenhouse gas inventory, a number of measures are already embedded within normal business operations that contribute to reducing greenhouse gas emissions.

8.1. Existing Carbon Reduction Measures

8.1.1 Hybrid Working

Employees normally work remotely for two days each week.

This working model significantly reduces commuting-related greenhouse gas emissions while maintaining operational effectiveness and employee collaboration.

8.1.2 Digital-First Collaboration

The company routinely uses secure cloud-based collaboration platforms, video conferencing and digital documentation systems to reduce unnecessary travel and paper consumption.

Remote meetings are used wherever appropriate before international travel is considered.

8.1.3 Cloud-Based Infrastructure

The company utilises Amazon Web Services (AWS) and Google Workspace to support software development, customer services, collaboration and business continuity.

Cloud services allow infrastructure to be scaled according to operational requirements, reducing unnecessary hardware deployment.

8.1.4 High Utilisation of It Assets

Employee laptops, engineering workstations and technical equipment are retained throughout their planned operational lifecycle wherever practicable.

The typical replacement cycle for employee laptops is approximately five years.

This approach reduces unnecessary electronic waste and maximises the value obtained from purchased equipment.

8.1.5 Responsible Management of Electronic Equipment

End-of-life electronic equipment is disposed of through authorised recycling and waste management providers in accordance with applicable environmental legislation.

Where equipment remains operational, redeployment within the organisation is considered before replacement.

8.1.6 Paper Reduction

The company operates predominantly digital business processes.

Quality documentation, software lifecycle records, customer documentation and internal procedures are managed electronically wherever possible.

This significantly reduces paper consumption and associated environmental impacts.

8.1.7 Efficient Office Operations

The company operates from a single office location, reducing duplication of facilities and associated energy consumption. A dedicated technical room houses on-premises servers supporting software development, testing and validation activities.

Operational equipment is reviewed periodically to identify opportunities for improved energy efficiency.

9. PLANNED CARBON REDUCTION INITIATIVES

ADAS3D MEDICAL intends to implement additional initiatives over the coming years, including:

- Annual monitoring and reporting of greenhouse gas emissions.
- Continued optimisation of electricity consumption within office and technical infrastructure.
- Increased monitoring of cloud resource utilisation to minimise unnecessary computing capacity.
- Greater engagement with suppliers regarding environmental performance and sustainability.
- Continued promotion of remote meetings where appropriate to reduce international travel.
- Review of opportunities to procure lower-carbon IT equipment as part of future replacement programmes.
- Increased employee awareness of sustainable commuting and responsible energy use.
- Continued improvement of greenhouse gas data quality across all Scope 3 categories.

These initiatives will be incorporated into the company's environmental management activities and reviewed annually.

10. GOVERNANCE

Overall responsibility for this Carbon Reduction Plan rests with the top management.

Top management is responsible for:

- Approving this Carbon Reduction Plan;
- Reviewing annual greenhouse gas performance;
- Monitoring progress towards Net Zero;
- Allocating appropriate resources for carbon reduction initiatives;
- Promoting continual environmental improvement throughout the organisation.

Carbon reduction performance will be reviewed at least annually and updated where significant organisational or operational changes occur.

Environmental considerations will increasingly be incorporated into strategic planning, procurement decisions and operational improvement activities.

11. CONTINUOUS IMPROVEMENT

ADAS3D MEDICAL recognises that carbon management is an evolving process.

As greenhouse gas reporting capabilities mature, future Carbon Reduction Plans will include:

- Enhanced activity-based calculations;
- Greater use of primary data;
- Expanded Scope 3 reporting;
- Quantified annual reduction targets;
- Increased engagement with customers and suppliers on sustainability matters.

This continuous improvement approach will support the company's long-term objective of achieving Net Zero greenhouse gas emissions by 2050 while continuing to provide safe, effective and innovative medical device software solutions.

12. DATA QUALITY AND REPORTING LIMITATIONS

ADAS3D MEDICAL is committed to continually improving the accuracy, completeness and transparency of its greenhouse gas reporting.

This Carbon Reduction Plan represents the company's first organisational greenhouse gas inventory prepared in accordance with the requirements of PPN 006 and the Greenhouse Gas Protocol.

Wherever possible, emissions have been calculated using primary operational data supplied by the company, including:

- Annual electricity consumption;
- Employee numbers;
- Office occupancy;
- Business travel records;
- Information technology asset inventory;
- Operational infrastructure.

Where primary emissions data were unavailable, recognised estimation methodologies have been applied using the UK Government Greenhouse Gas Conversion Factors (DESNZ), the officially published Spanish national grid electricity factor (CNMC) for Scope 2, and other accepted greenhouse gas accounting principles.

ADAS3D MEDICAL recognises that certain Scope 3 categories currently rely on estimated activity data and intends to improve data quality through enhanced monitoring and supplier engagement during future reporting periods.

Future Carbon Reduction Plans are expected to incorporate an increasing proportion of supplier-specific and activity-based emissions data.

13. ORGANISATIONAL BOUNDARY

This Carbon Reduction Plan covers all operational activities undertaken by ADAS3D MEDICAL within its organisational boundary during the reporting period.

The reporting boundary includes:

- Corporate office activities;
- Software research and development;
- Software validation and testing;
- Quality management activities;

- Regulatory affairs;
- Customer support;
- Sales and marketing;
- Information technology infrastructure;
- On-premises server infrastructure;
- Cloud-hosted operational services.

The reporting boundary excludes activities over which the company does not exercise operational control.

14. ENVIRONMENTAL COMMITMENT

Environmental sustainability forms part of the company's broader commitment to responsible corporate governance and continual improvement.

ADAS3D MEDICAL recognises that innovation and sustainability should progress together.

The company is committed to integrating environmental considerations into decision-making wherever reasonably practicable while ensuring continued compliance with applicable regulatory requirements and maintaining the safety, effectiveness and quality of its medical device software.

This includes continued focus on:

- Efficient use of energy;
- Responsible procurement;
- Optimisation of digital infrastructure;
- Sustainable business travel;
- Responsible lifecycle management of information technology equipment;
- Continual improvement of greenhouse gas reporting.

15. FUTURE DEVELOPMENT

ADAS3D MEDICAL intends to further strengthen its environmental management framework over the coming years.

Future developments may include:

- Enhanced monitoring of electricity consumption;
- Improved measurement of employee commuting;
- Increased engagement with suppliers regarding greenhouse gas emissions;
- Assessment of renewable electricity procurement opportunities;
- Further optimisation of cloud computing resources;
- Expansion of environmental performance indicators;
- Periodic review of carbon reduction objectives.

These activities will support continual improvement and contribute towards achieving the company's Net Zero commitment.

16. DECLARATION AND SIGN-OFF

This Carbon Reduction Plan has been completed in accordance with Procurement Policy Note (PPN 006) and the associated guidance and reporting standard for Carbon Reduction Plans.

Greenhouse gas emissions have been reported and recorded in accordance with the GHG Reporting Protocol Corporate Standard and, where applicable, the Corporate Value Chain (Scope 3) Standard.

Scope 1 and Scope 2 emissions have been reported in accordance with the reporting requirements applicable to Carbon Reduction Plans.

Relevant Scope 3 emissions have been considered in accordance with the published Technical Standard for Carbon Reduction Plans.

Emission calculations have been prepared using the UK Government Greenhouse Gas Conversion Factors (DESNZ) for business travel and employee commuting, and the officially published Spanish national grid electricity factor (CNMC) for Scope 2 electricity, consistent with UK Government guidance directing organisations to national sources for overseas electricity emission factors.

This Carbon Reduction Plan has been reviewed and approved by ADAS3D MEDICAL Top Management, who is responsible for ensuring that the commitments contained within this document are implemented and reviewed on an annual basis.

Publication Date: 01-01-2025

Antoni Riu
Top Management

Date of Approval/Sign-off: 01-01-2025