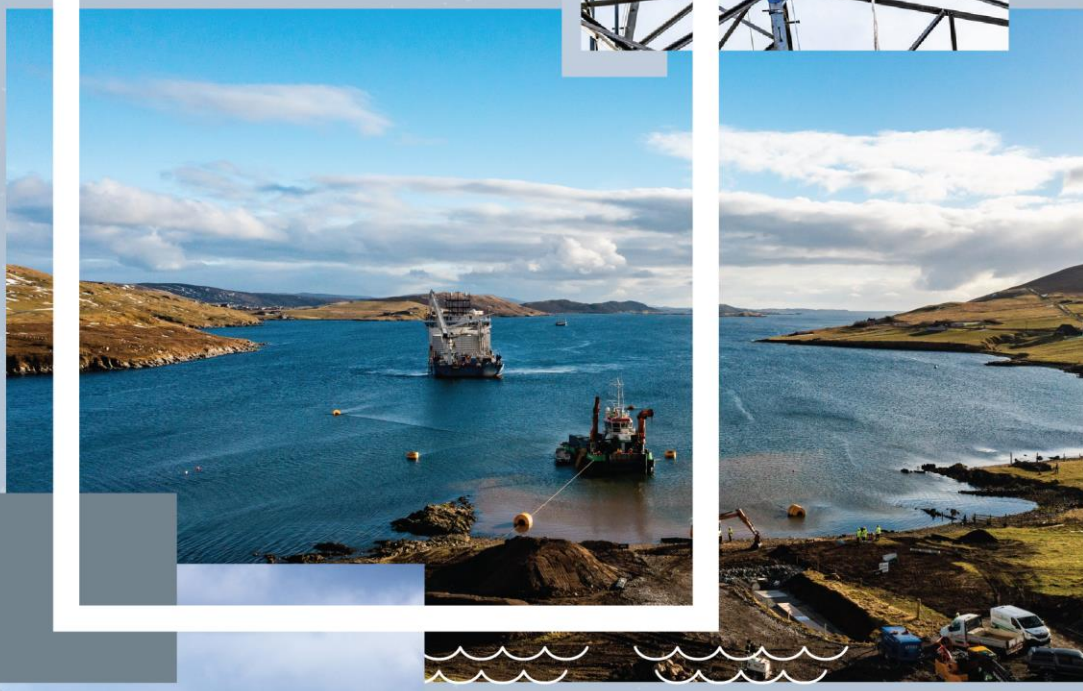


Sustainability Action Plan 2024-2031

December 2024

Scottish & Southern Electricity Networks

TRANSMISSION

Contents

About this document

This Sustainability Action Plan meets the requirements for an Environmental Action Plan as set out in the Final Business Plan Guidance for RIIO-T3.

The document sets out how we will meet the aims of our Sustainability Strategy and provides details of our sustainability targets and actions for the period from 2024 to 2031. Actions from our RIIO-T2 Sustainability Action Plan with target dates of 2025 or 2026 are included in this new document.

The first section outlines our Sustainability Strategy and provides an overview of how the Strategy was developed.

Section two provides the overview of our sustainability focus areas, aims, and targets, and details the actions we will take to achieve these.

Section three meets the Business Plan Guidance requirements around demonstrating the process followed to assess our impacts. Our detailed methodology is provided, along with the findings and opportunities and challenges for addressing our impacts.

Appendix 1 sets out the costs and benefits of our Sustainability Action Plan and provides further detail on metrics.

Appendix 2 provides a summary of anticipated lower and upper bounds of impacts where such an assessment is possible.

Appendix 3 demonstrates how this Sustainability Action Plan meets the requirements set out in the Final Business Plan Guidance.

Sustainability Action Plan – key messages

Taking practical action to make a material difference

Track record of sustainability leadership

- Climate: We were the first network company to set a science-based emissions reduction target aligned with the Paris Agreement 1.5 degree warming limit.
- Nature: We are leaders in the development and implementation of terrestrial biodiversity net gain practices, and we are now extending this leadership into the marine environment.
- Communities: We have active programmes to deliver hundreds of homes in the north of Scotland and local social and economic benefits from our investment programme.
- Corporate responsibility: We were early adopters of the living wage and fair tax mark, and are advocates of the just transition to clean energy.

Ambitious Sustainability Strategy

- Our Sustainability Strategy was updated in September 2024 for the 'Pathway to 2030'
- The Strategy focuses on our most material areas - climate, nature, and communities - and on *how* we deliver against them through procurement, our people, and our systems, processes and performance management
- It is based on the latest science, evidence-based and aligned with global best practice.
- Our 2030 strategic goal is to "Drive investment in the energy transition that delivers transformative lasting benefits for local communities, our economy and nature"

Comprehensive roadmap for implementation

- This document provides a detailed action plan with 27 target outcomes broken down into sub-actions for delivery
- Actions in this plan are integrated into activities across our growth and resilience investments to ensure efficiency in delivery.
- Mechanisms for regulatory approval and cost allowance for each action have been identified, including via in-period uncertainty mechanisms.
- We are committed to annual reporting of sustainability performance in line with global standards.

A business that is fair and sustainable

Our Sustainability Strategy and Action Plan demonstrate world-leading ambition whilst recognising the urgency of delivery on the Pathway to 2030. We will:

- **Build** on strong foundations, evolving our ambition on climate change, nature, and communities,
- **Power** sustainability leadership through a focus on procurement, people, and performance, and
- **Connect** to global sustainability ambition, best practice standards, and the latest science.

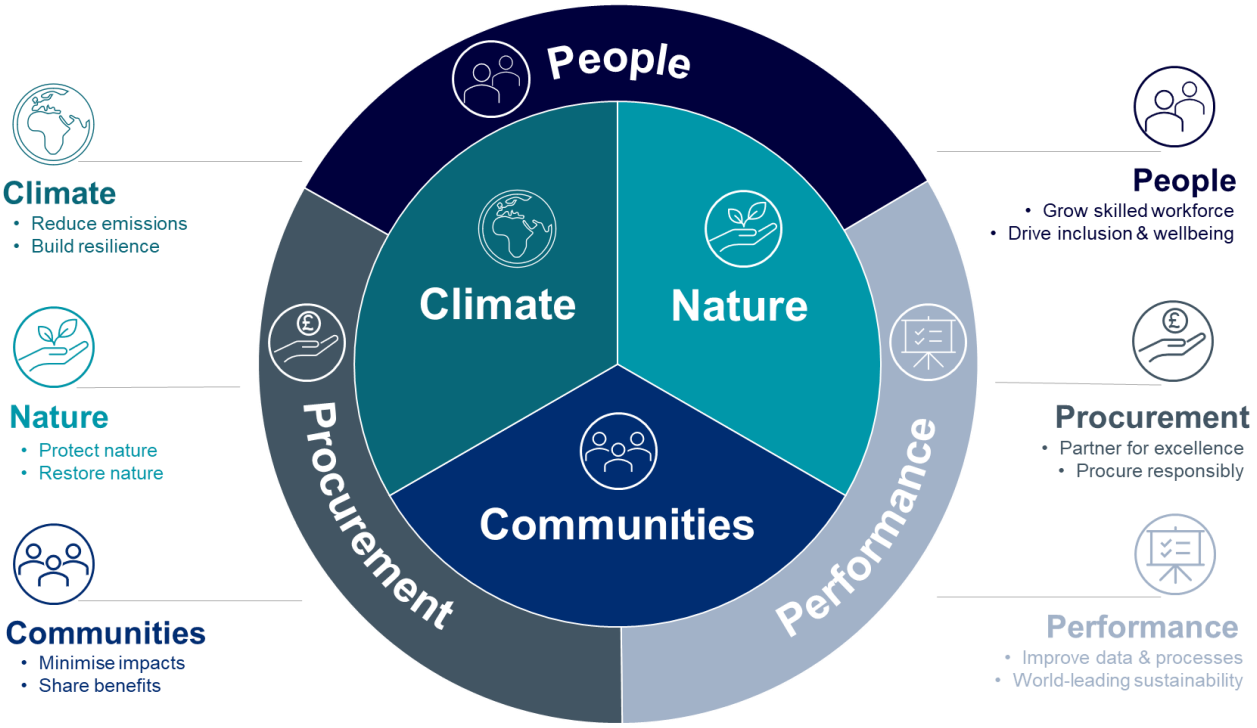
We aim to for transformative, lasting benefits, ensuring our network is resilient to the impacts of climate change, helping the natural environment to thrive, and leaving a positive legacy for communities.

1. Our Sustainability Strategy

SSEN Transmission's Sustainability Strategy supports our aim of delivering a network for net zero and in doing so in a fair and sustainable way. The Strategy will inform decision making and action up to and including 2030. It aims to:

- **Build** on strong foundations, evolving our ambition on climate change, nature, and communities.
- **Power** sustainability leadership through a focus on procurement, people, and performance, and
- **Connect** to global sustainability ambition, best practice standards, and the latest science.

These three aims recognise our current context and future direction and reflect our maturity in delivering on our sustainability ambition. This Strategy focuses on our most material areas (climate, nature, and communities) and on *how* we deliver against them (through procurement, our people, and our systems, processes and performance management). In doing so, it demonstrates world-leading ambition whilst recognising the urgency of delivery.



The Sustainability Strategy connects with our enterprise strategy and key business strategies. It delivers on our aims for "Leadership in Sustainability" and "to be a Fair and Sustainable Business". It also complements and connects with the Innovation Strategy and Digital Strategy.

A set of responsibilities act as a sense-check for all other commitments and targets in this Strategy. Responsibilities are:

- Network reliability.
- Safety, health, and wellbeing.
- Affordability for consumers.
- Our ability to deliver a Network for Net Zero.

Our sustainability targets and actions can be found throughout the rest of this document.

This Sustainability Strategy is:

A. **Informed by materiality**. The aims, commitments and targets are informed by an assessment of our material impacts, risks, and opportunities, and our material topics align with the UN Sustainable Development Goals.
B. **Inspiring and leading**. Our Strategy builds on the latest science and is evidence based, taking account of where we can and should make the biggest positive difference.
C. **Credible and robust**. We are aligned with global best practice in sustainability, such as the UN Global Compact, Global Reporting Initiative and SASB Standards. Over 150 external stakeholders were engaged as part of the Strategy development process.
D. **Practical and achievable**. Our Strategy is informed by evidence and has been developed collaboratively with over 100 colleagues from almost every Directorate across Transmission over several months to ensure actions are practical and commitments achievable.

How we developed our Sustainability Strategy

Our Sustainability Strategy builds on a double materiality assessment undertaken in late 2023 in line with global best practice at the time. A double materiality assessment is a robust process to determine which topics (impacts, risks, and opportunities) are most material for a business. The process examines both the impacts OF the business on the outside world (on people, the economy and the environment) and the ways that the outside world impacts ON the business and on its financial sustainability.

Our double materiality assessment included a context review, detailed impact assessment, and stakeholder engagement. The assessment provided a valuable basis for strategy development and future reporting.

In addition to the double materiality assessment, the development of the Sustainability Strategy also included commissioning external research on best practice from the University of Strathclyde, extensive engagement with over 150 stakeholders or stakeholder groups, and target development and testing with a wide range of colleagues at all levels across SSEN Transmission.

2. Sustainability Action Plan on a page

Focus areas	Climate Actively reduce our emissions whilst building a resilient network for a climate-changed world.	Nature Take a nature positive approach, to protect and restore nature.	Communities Ensure benefits are shared with communities and any adverse impacts are minimised.	Procurement Forge partnerships for excellence in procurement, ensuring responsible sourcing.	People Grow our skilled workforce and continue to drive inclusion and wellbeing.	Performance Understand our impacts from a global to local scale by enhancing data and processes.
Aims	• Reduce emissions • Build resilience	• Protect nature • Restore nature	• Minimise impacts • Share benefits	• Partner for excellence • Procure responsibly	• Grow skilled workforce • Drive inclusion & wellbeing	• Improve data & processes • World-leading sustainability
Targets	1. Deliver the capacity required to enable one-seventh of the UK's decarbonisation by 2050.	7. Natural capital impacts are considered in 100% of design decisions and developments by 2030.	12. Deliver excellent, externally accredited community engagement.	16. Enhance supplier data capture and analysis, ensuring 100% of suppliers provide required data.	22. Develop and implement a Just Transition Workforce Plan by 2026.	26. Improve quality, accuracy, and analysis of sustainability data and processes, and align sustainability reporting with global best practice by 2027.
	2. Reduce Scope 1 and 2 GHG emissions by 46% by 2029/30 in line with a 1.5° warming limit.	8. Protect irreplaceable habitats and deliver no net loss of woodland.	13. Better understand and manage our impacts on communities.	17. Engage with supply chain to identify opportunities for sustainability leadership.	23. Build our capacity and capability in sustainability by 2027.	27. By 2030, assess our impacts on planetary boundaries.
	3. Reduce Scope 3 GHG emissions in line with best practice standards.	9. Deliver 10% biodiversity net gain and leave a positive legacy for nature.	14. Deliver our community benefit fund from 2024 and support communities to access funding for local priorities.	18. By 2027, achieve external verification of alignment with ISO standard for sustainable procurement.	24. Continue to drive inclusion and diversity through a new SSENT I&D hub and census-informed diversity targets.	
	4. By 2025, develop position on a long-term net zero target.	10.Be industry leaders in marine habitat monitoring and restoration by 2030.	15. Leave a positive community legacy by delivering hundreds of homes by 2030.	19. Identify and realise circular economy opportunities, ensuring zero waste to landfill by 2026.	25. By 2027, foster a wellbeing culture within SSENT and in partnership with our suppliers.	
	5. By 2027, assess nature carbon impacts consistently with other Transmission Operators.	11. Assess contaminated land sites by 2030.		20. By 2027, deliver local social and economic benefits on every project, and strive to maximise suppliers located in the north of Scotland.		
	6. By 2027, establish world-class climate risk, resilience and adaptation approach.			21. Review and refresh human rights due diligence approach by 2027.		

Sustainability Action Plan Roadmap

The tables below show what actions we intend to take, and over what time period, to achieve the targets in our Sustainability Action Plan. Note that these are indicative roadmaps, subject to regulatory approval and funding allowances being made. Our targets and roadmap will be reviewed in line with international best practice and our regular materiality assessments.

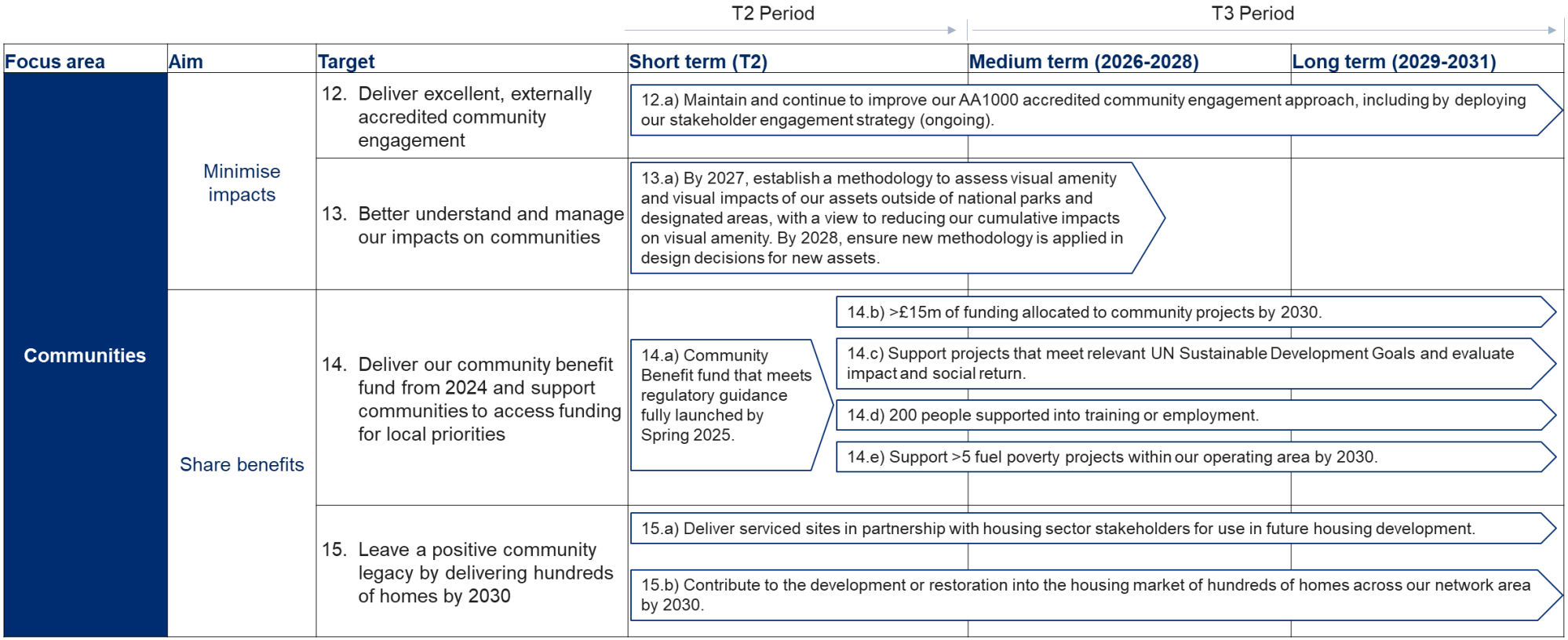
Climate

Focus area	Aim	Target	Short term (T2)	Medium term (2026-2028)	Long term (2029-2031)
Climate	Reduce emissions	1. Deliver the capacity required to enable one-seventh of the UK's decarbonisation by 2050	1.a) Deliver our T3 and ASTI projects.		
		2. Reduce Scope 1 and 2 GHG emissions by 46% by 2029/30 in line with a 1.5° warming limit	2.a) Develop and implement IIG Strategy including targets for SF6 alternatives, leakage rate targets and innovation.	2.b) Rollout energy monitoring for 100% of substations by 2030. 2.c) By 2030, install EV charging infrastructure required to meet our EV100 commitment.	
			2.d) By 2026, develop an operational transport emissions reduction plan, including a plan for transitioning our fleet to EVs.		
		3. Reduce Scope 3 GHG emissions in line with best practice standards	3.a) By 2025, set a Scope 3 GHG emissions reduction target aligned with Science Based Target initiative criteria, and develop an emissions reduction plan to achieve this target.	3.b) By 2026, align with the PAS2080 standard for carbon management in buildings and infrastructure and achieve external verification by 2028. 3.c) By 2030, reduce the carbon intensity of our transmission losses by 50%.	
		4. By 2025, develop position on a long-term net zero target	4.a) By 2025, develop a cost benefit position paper on whether and how to set a net zero emissions target.		
		5. By 2027, assess nature carbon impacts consistently with other Transmission Operators	5.a) By 2027, work in partnership with other TOs and experts to develop and implement a standard methodology to assess our nature carbon impacts in line with evolving best practice.		
	Build resilience	6. By 2027, establish world-class climate risk, resilience and adaptation approach	6.a) By 2027, build on global best practice standards to assess and report on physical and transition risks to SSENT, including but not limited to assets. 6.b) By 2028, develop a partnership with other TOs, academic institutions and others to explore how to take account of climate tipping points and cumulative impacts in climate risk assessments.	6.c) By 2029, update our business-wide climate resilience and adaptation strategy.	

Nature

Focus area	Aim	Target	T2 Period: Short term (T2)	T3 Period: Medium term (2026-2028)	T3 Period: Long term (2029-2031)
Nature	Protect nature	7. Natural capital impacts are considered in 100% of design decisions and developments by 2030	7.a) By 2026, work with other TOs to assess impacts of materials and construction methods on nature, including cumulative impacts.	7.b) By 2030, consider natural capital in design decisions by incorporating natural capital accounting into our impact assessments.	
		8. Protect irreplaceable habitats and deliver no net loss of woodland	8.a) Follow mitigation hierarchy for irreplaceable habitat (ongoing). 8.b) Continue to deliver no net loss of woodland through compensatory planting (ongoing).		
	Restore nature	9. Deliver 10% biodiversity net gain and leave a positive legacy for nature	9.a) Deliver 10% biodiversity net gain on all projects gaining consent (ongoing). 9.b) Monitor and maintain restoration sites both on SSENT-owned land and on land owned by partners, implementing new data management system by 2026. 9.c) By 2026, update governance approach to manage funding for restoration, monitoring and maintenance to ensure the ongoing protection of restoration sites.	9.d) Undertake location-specific restoration initiatives for key species and habitats, targeting action at species and habitats most impacted by development, drawing on EIA findings.	
		10. Be industry leaders in marine habitat monitoring and restoration by 2030	10.a) Collaborate with other TOs and experts across the UK to lead on the development and adoption of an agreed methodology for measuring BNG in the marine environment by 2027. 10.b) By 2030, deliver large scale oyster restoration in partnership with experts. 10.c) By 2030, deliver large scale seagrass restoration in partnership with experts. 10.d) By 2030, support skills and workforce development through a Marine Habitat Restoration Academy.	10.d) By 2030, work with partners to implement use of Distributed Acoustic Sensing (DAS) to monitor habitat restoration / recovery	
		11. Assess contaminated land sites by 2030	11.a) Undertake detailed site surveys for all sites where contaminated land risk has been identified by 2030.		

Communities



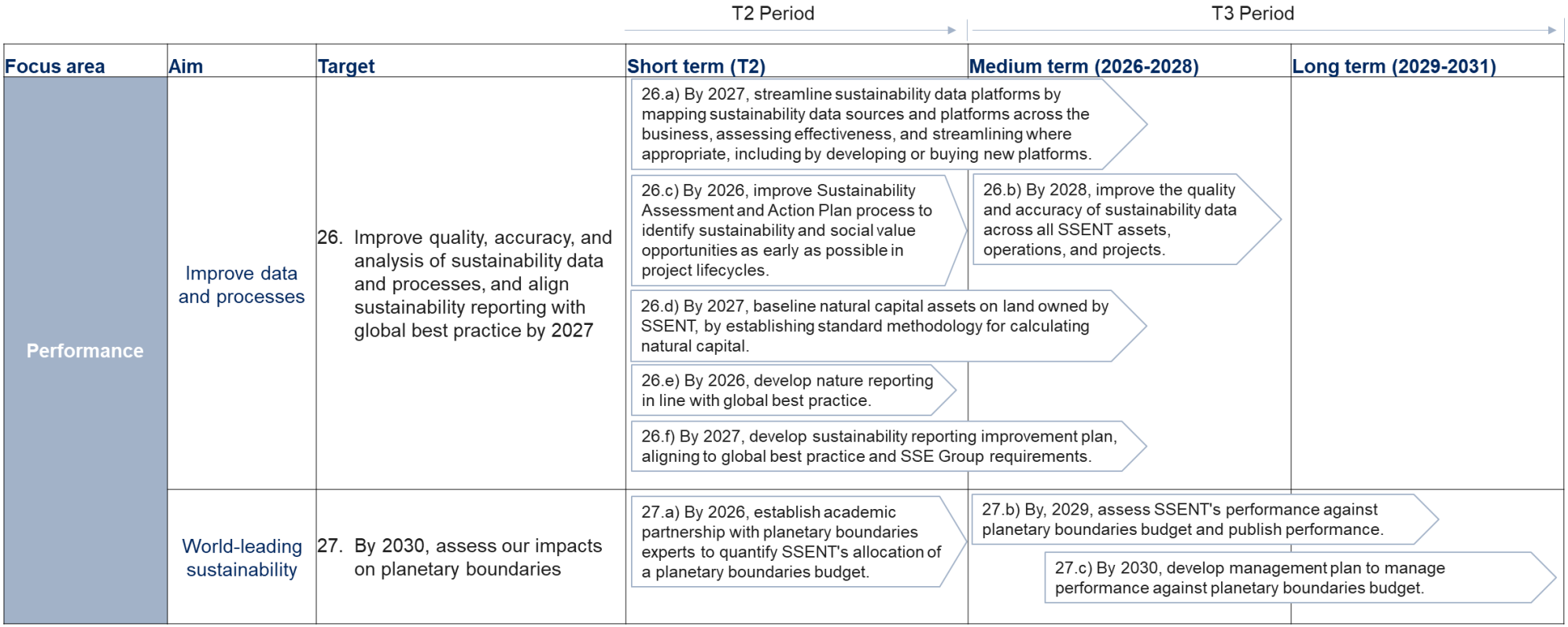
Procurement

			T2 Period	T3 Period	
Focus area	**Aim**	**Target**	**Short term (T2)**	**Medium term (2026-2028)**	**Long term (2029-2031)**
Procurement	Partner for excellence	16. Enhance supplier data capture and analysis, ensuring 100% of suppliers provide required data	16.a) By 2026, update Sustainability Works Information, streamline supplier KPIs, standardise PQQ and ITT questions and create procurement questions for specific project types.	16.b) By 2027, develop best practice library and share with suppliers. Provide templates and clear guidance for suppliers on how and when to submit opportunities.	
		17. Engage with supply chain to identify opportunities for sustainability leadership	17.a) >80% of suppliers by spend engaged on sustainability by 2026.		
	Procure responsibly	18. By 2027, achieve external verification of alignment with ISO standard for sustainable procurement	18.a) By 2026, update Sustainable Procurement Guidance for Transmission to ensure 100% of tenders for onshore and offshore projects over a value of £40m have weightings of no less than 20% for sustainability and social value (combined), rising to >30% by 2030. 18.b) By 2027, achieve external verification of alignment with ISO20400 principles.		
		19. Identify and realise circular economy opportunities, ensuring zero waste to landfill by 2026.	19.a) By 2025, rollout internal Transmission tools for inventory management and to assess quality and performance of existing assets for potential reuse. 19.b) Zero waste to landfill and >70% of waste recycled by 2026, rising to 80% by 2030. 19.c) By 2027, 100% of design decisions include aim to reduce waste and consider end-of-life destination for materials and assets.		
		20. By 2027, deliver local social and economic benefits on every project, and strive to maximise suppliers located in the north of Scotland	20.a) By 2027, demonstrate social value created in large capital projects, using consistent metrics, tools, and methodologies, and a shared approach with other TOs. 20.b) Engage with suppliers to maximise opportunities for businesses located in the north of Scotland.		
		21. Review and refresh human rights due diligence approach by 2027	21.a) Implement a refreshed approach to human rights and modern slavery due diligence with key suppliers by 2027.		

People

			T2 Period	T3 Period	
Focus area	**Aim**	**Target**	**Short term (T2)**	**Medium term (2026-2028)**	**Long term (2029-2031)**
People	Grow skilled workforce	22. Develop and implement a Just Transition Workforce Plan by 2026	22.a) By 2025, publish a Just Transition Workforce Plan. 22.b) By 2026, develop and deploy a refreshed employee engagement strategy, including engagement with former high-carbon workers. 22.c) By 2027, develop and rollout a refreshed talent attraction program to grow the skilled workforce needed now and into the future.	22.d) By 2027, role out a refreshed talent development strategy to develop current and future talent, including sharing best practice in STEM engagement with supply chain partners and others. 22.e) By 2028, collaborate with partners to support, train, and support the nature workforce of the future.	
		23. Build our capacity and capability in sustainability by 2027	23.a) By 2026, assess training needs, and develop and launch a Sustainability training and development plan for SSENT, with appropriate resources for different roles and teams. 23.b) Work with SSE Group to refresh Transmission's approach to employee volunteering program by 2026, ensuring that >25% of employees use at least one volunteering day per year by 2027, and >50% by 2031.		
	Drive inclusion and wellbeing	24. Continue to drive inclusion and diversity through a new SSENT I&D hub and census-informed diversity targets.	24.a) Launch the SSENT Inclusion and Diversity Hub by 2025 and continue to deliver a program of inclusion focused campaigns and activities including supporting the Inclusion and Diversity Committee.	24.b) By 2026, increase the diversity of our workforce by adopting census-informed diversity targets, and by 2027 engage with key suppliers to do the same.	
		25. By 2027, foster a wellbeing culture within SSENT and in partnership with our suppliers	25.a) By 2026, achieve ISO 45003 on psychological health and safety at work and by 2028, engage with key suppliers to adopt the same standard.	25.b) By 2027, work with key suppliers to develop a program of mental health support for SSENT staff and contractors.	

Performance



3. Impact assessment

Our Sustainability Strategy takes a holistic view of how best to manage our impacts on the environment, as well as on people and the economy. This includes the direct carbon impacts claimed in Investment Decision Pack submissions and submissions where carbon reduction is the main driver of the proposal or where carbon reduction contributes to a substantial part of the benefits claimed by the projects.

This section describes how we have assessed our impacts, in line with best practice standards, as part of a double materiality assessment.

Impact assessment methodology

The aim of our impact assessment was to identify, assess, and prioritise the positive and negative impacts that SSEN Transmission has, or could have, on the outside world (people, the environment and economy), and the positive and negative impacts that the outside world has, or could have, on SSEN Transmission, including on our financial sustainability.

Identifying potential impacts

Impacts were identified and assessed through a detailed context review, a sustainability standards review, and through a series of meetings with internal SMEs. Further detail on each of these activities is provided below.

Context review

This context review aimed to understand SSEN Transmission's operating context, including a value chain mapping exercise, a review of current priorities for SSENT and SSE Group, an assessment of current and potential future risks, and analysis of trends likely to create risks, opportunities, or areas of impact which might be material for the business.

The process included a peer review, which examined the material topics of comparable transmission owners and operators in Great Britain and Europe. Trends analysis drew on the latest global, UK and Scottish publications on sustainability trends, including environmental and climate action, as well as trends around workforce topics, community engagement, and governance.

A detailed risk and opportunity mapping process involved identifying risks and opportunities emerging from trends analysis and from our wider Enterprise Risk Management Framework. Finally, a value chain mapping exercise aligned with the requirements of the draft European Sustainability Reporting Standards (ESRS) and Global Reporting Initiative (GRI) provided useful insights into potentially material impacts, risks, and opportunities.

Sustainability standards review

The standards review drew on sustainability standards, including voluntary standards, Ofgem's reporting requirements which detail specific topics for reporting, and standards such as the European Sustainability Reporting Standards (ESRS) which will become mandatory for SSEN Transmission during the T3 period. Voluntary standards included Global Reporting Initiative (GRI) topics and Sustainability Accounting Standards Board (SASB) sector specific topics. The review highlighted impacts, risks and opportunities that could be material for our business.

SME engagement

Over 35 subject matter experts (SMEs) were engaged at least once as part of the impact assessment. Engagement took the form of one-to-one interviews and the sharing of documentation such as Environmental Impact Assessments and Biodiversity Net Gain Tool calculation examples. These exercises helped to inform a long list of impact areas, and potential material topics, and to develop the approach to assessing our impacts.

Assessing our impacts

An Excel-based tool was developed in-house, building on recent guidance from the Global Reporting Initiative (GRI) and the European Financial Reporting Advisory Group (EFRAG). In total, 25 headline topics and 62 sub-topics were identified, and a series of 30 questions were developed to assess impacts for the 62 sub-topics.

The 62 sub-topics covered environmental topics such as pollution, climate change, biodiversity and resource use. In addition, sub-topics also covered social issues including community impacts, engagement, and benefits, diversity and inclusion within our workforce, and supply chain social impacts. Finally, topics related to economic and governance issues were assessed. These included our economic contribution, and our approach to ethics, transparency and good governance.

Drawing on GRI guidance, the impact assessment was split into external (our impacts on the outside world, including people, the environment, and economy) and internal (impacts of the outside world on our business) assessments.

External impact assessment

The external impact assessment asked “what positive or negative impacts do we currently have, or could we have on the outside world in a reasonable worst-case scenario?”. The assessment then asked “what positive or negative impacts do we currently have, or could we have on the outside world in a reasonable best-case scenario?”. This definition was then used as the basis for assessing each sub-topic against a range of criteria, and was tested with SMEs. SSEN Transmission developed a characteristic test as part of the impact assessment. This test covered four areas:

- Actuality: Are impacts identified in the definition actual or potential impacts?
- Intentionality: Is any actual or potential impact created intentionally or unintentionally by SSEN Transmission?
- Responsibility: Is our business directly causing this impact, contributing to it, or linked to it through our value chain?
- Positive/negative: Is the impact broadly positive or broadly negative?

Following the characteristic test, each impact was then assessed against a range of criteria which drew on our Enterprise Risk Management Framework and on GRI guidance on materiality assessments. This impact test included the following elements:

Assess negative impacts

- Duration of harm/benefit
- Severity (consisting of fixability, scale, and scope) or Significance (consisting of contribution to SDGs, scale, and scope)
- Likelihood

Internal impact assessment

Following the assessment of our impacts on the outside world, each sub-topic was then subject to an internal impact assessment. As with the assessment of the our external impacts, this step started with a definition of the impacts. This step asked “what are the current positive or negative impacts of each topic on the business? If we manage the topic well or poorly, what positive or negative impacts could be generated?”. This definition then guided the responses to another characteristic test (using the same criteria as above) and an assessment of both negative and positive impacts. The assessment drew on our Enterprise Risk Management Framework, and used a six point scale from negligible to catastrophic, covering the categories of people, environment, assets and financial, and regulatory/obligations. The assessment also examined the likelihood of impacts occurring.

Materiality assessment findings – analysis of significant impacts

Our materiality assessment showed that enabling decarbonisation was our most significant impact, followed by community impacts, engagement, and benefits, network reliability, affordability, and safety. This demonstrates that SSEN Transmission's focus on safely delivering a reliable and affordable network for net zero, and on leaving a positive legacy for communities aligns with our most material impacts, risks, and opportunities.

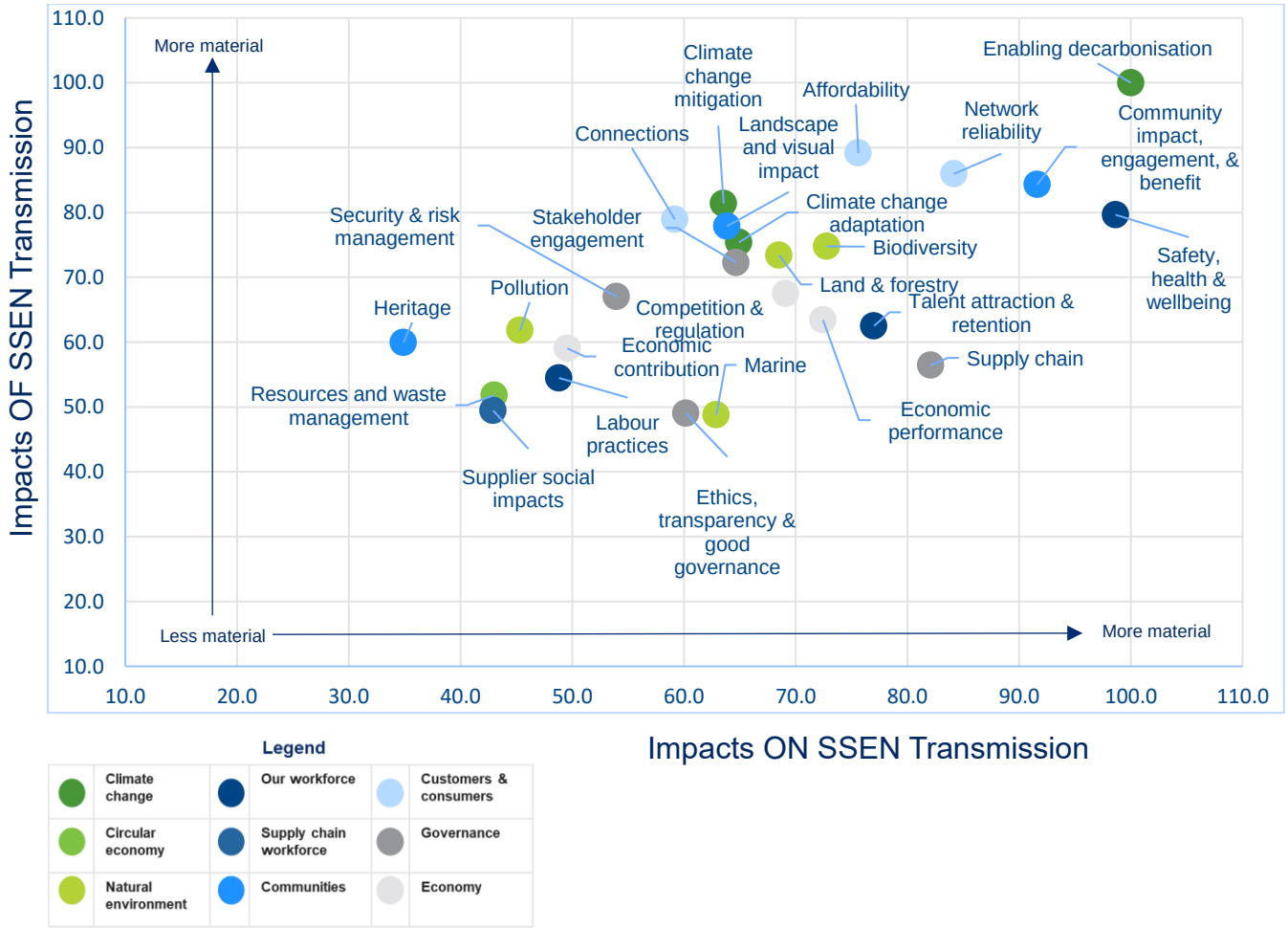
Community impacts, engagement and benefit were shown to be highly material for the business, indicating a need to prioritise actions to minimise any negative impacts, and to share the benefits of the energy transition with communities most impacted by it.

Climate impacts were highly material, both in how we manage and reduce our GHG emissions, and in how we adapt to the impacts of climate change. The impact assessment detailed above, found that IIG emissions and capital carbon (embodied carbon) were particularly impactful, followed by other Scope 1 and 2 emissions, land carbon, and climate resilience.

Nature-related topics including biodiversity and land and forestry were also found to be highly material, scoring almost exactly the same as climate topics in the materiality assessment. Stakeholder engagement also identified that our impacts in the marine environment are likely to increase in the coming years, with this topic likely to grow in materiality as a result.

Areas of high impact on our business include securing and managing our supply chain, and attracting and retaining our skilled workforce. The materiality assessment also highlighted the impacts we have, and the risks and opportunities presented by our approach to customer connections and stakeholder engagement. Our economic performance and how we meet our regulatory obligations are also material for the business.

Topics of lower materiality include pollution, resources and waste management, and supplier social impacts (such as human rights in the supply chain). These are still material topics, but to a lesser extent than the other topics noted above. Our materiality matrix is shown below, showing the relative materiality of 25 topics.



Opportunities and challenges for addressing material impact areas

The materiality assessment conducted in 2023 clearly demonstrates that we were already addressing many of our most material impact areas. Further stakeholder engagement was undertaken in 2024 to build on the materiality assessment and explore opportunities and challenges for how to address our material topics in our Sustainability Strategy.

This engagement, including both internal subject matter experts and external stakeholders, identified three strategic aims to guide how we address material impact areas out to 2030/31. These were to:

- **Build** on strong foundations, evolving our ambition on climate change, nature, and communities.
- **Power** sustainability leadership through a focus on procurement, people, and performance, and
- **Connect** to global sustainability ambition, best practice standards, and the latest science.

These strategic aims build on SSEN Transmission's strengths, demonstrated by our leadership in setting a science based target, our pioneering work to deliver biodiversity net gain, and our continued achievement of top ratings for stakeholder engagement against global standards.

Building on our foundations in climate change means continuing to find ways to reduce our greenhouse gas emissions and by building our resilience to the impacts of climate change. Stakeholder engagement and expert research identified challenges in reducing Scope 3 emissions as we grow the network, and in managing transport emissions as we significantly increase our workforce. However, opportunities were identified to limit SF6 on the network and to continue our leadership in minimising SF6 leakage. Similarly, there are opportunities to limit the predicted growth in Scope 3 emissions by opting for low carbon materials and construction methods.

In the nature space, building on strong foundations means continuing to deliver biodiversity net gain (BNG) at scale, and to strengthen our partnership working to secure the land needed, and at a price that secures value for billpayers and for communities. It also means strengthening our approach to nature restoration beyond terrestrial habitats (the current limit of BNG) and pioneering new approaches to marine restoration. Similarly, stakeholder engagement and research identified opportunities to undertake locally sensitive restoration works, including those focused on species rather than habitats.

Building on our track record of engaging with communities in line with the AA1000 Stakeholder Engagement standard, opportunities were identified to deliver community benefit funding and to develop housing for workers and local community benefit.

Our Community Benefit Fund, launched in 2024, consists of regional funding aligned with three goals around people, place, and alleviating fuel poverty. These aims are a direct response to stakeholder engagement. Local funds will also support communities impacted by transmission infrastructure and will provide funding for priorities identified by local people. In addition, SSEN Transmission identified an urgent need for housing provision, both for workers on our capital projects, and for local communities across the north of Scotland. With an anticipated peak of over 5000 workers on site across SSEN Transmission construction sites by 2027, the need for worker accommodation in some of the most remote parts of Scotland presents a challenge. At the same time, communities in our operating area are facing a housing crisis, with a shortage of homes available. Therefore, our Housing Strategy aims to build and refurbish hundreds of new homes which will be available for workers on our projects, and will then help to address the housing crisis, benefiting communities impacted by our works.

The materiality assessment showed that topics such as talent attraction and retention and supply chain sustainability were highly material, in addition to stakeholder engagement, economic performance, and ethics, transparency and good governance. Engagement with internal and external stakeholders, as well as expert advice from the University of Strathclyde's Centre for Energy Policy, suggested that these findings presented both challenges and opportunities. For example, growing our skilled workforce at a time of high competition for skilled workers in the clean energy sector is a challenge, as is responsibly securing the supply chain needed to deliver network growth. However, growing our workforce in a

planned way that aligns with just transition principles presents an opportunity to leave a lasting legacy of green jobs and highly skilled workers across the north of Scotland and beyond. Similarly, the economic opportunities presented by network growth could significantly benefit local businesses and the wider economy.

To power the next phase in our sustainability leadership will require taking proactive action to grow our skilled workforce, procure responsibly and in partnership with suppliers, and to track and measure our performance in meaningful and efficient ways.

Connecting to world leading science means aligning with best practice standards including relevant voluntary standards such as ISO 20400 for sustainable procurement, and British standards for climate adaptation. Research conducted by the University of Strathclyde indicated a unique opportunity to measure SSEN Transmission's impacts against planetary boundaries. By doing so, we will be among the first businesses in the world to assess our performance against this leading science, and we will have access to data that will allow us to make more informed and targeted decisions about sustainability actions, based on their global and local impacts.

Our long-term sustainability goals

Whilst a double materiality assessment provides an invaluable basis for strategic priorities and decisions in the short- to medium-term, it is also important that we set out our longer-term vision for sustainability, including our vision for enabling and driving the energy transition. Our Sustainability Strategy contributes to all three of our 2030 goals:

Our 2030 goals	How our Sustainability Strategy and Action Plan will contribute to meeting these goals
Reliable energy: Zero interruptions in electricity supply to homes and business due to our network.	• Strengthening our approach to climate risk, resilience, and adaptation will enable us to minimise climate-related risks to our network.
Clean power: Our network will have the capability to meet 20% of the GB demand for clean power.	• A key goal of our Sustainability Action Plan is to enable one-seventh of the decarbonisation action needed to achieve net zero across the UK, by delivering our T3 and ASTI program.
Our legacy: Drive investment in the energy transition that delivers transformative lasting benefits for local communities, our economy and nature.	• Our Sustainability Strategy and Action Plan directs investment towards not only doing less harm, but to leaving a positive legacy for people, the economy, and environment.

The legacy we aim to secure in the T3 period will last long beyond 2030/31

Appendix 1 – SAP Actions, Metrics, Costs and Benefits

The table below sets out our targets, the actions we intend to take to achieve them (subject to regulatory approval and funding allowances being made), and the metrics we will use to measure progress. Also included is a summary of the costs and benefits related to each action, and a note on the value we anticipate each action will deliver, along with a note on the relevant funding mechanism. Where a measure is not included, we will update the table using 2024/25 data as a baseline to anticipate the measures at the end of T2 and T3.

Target	Action (Initiative identifier)	Description	Metric	Measure at end T2	Measure at end T3	Description of benefit and value for money	Cost of delivery	Funding mechanism
1. Deliver the capacity required to enable one-seventh of the UK's decarbonisation by 2050.	1.a) Deliver our T3 and ASTI projects.	This is our core mission as a business. Including a target ensures we're able to demonstrate the value of all other initiatives in delivering a network for net zero.	% of decarbonisation action supported through our network	TBC	18-20%	Delivery of a network for net zero, enabling decarbonisation across Great Britain.	n/a[1]	T3, ASTI and LOTI
2. Reduce Scope 1 and 2 GHG emissions by 46% by 2029/30 in line with a 1.5° warming limit	2.a) Develop and deliver an IIG Strategy including targets for SF6 alternatives, leakage rate targets and innovation	638.68kg of SF6-containing assets with poor performance removed. A further 30,625.85kg of SF6 will benefit from proactive intervention on SF6-containing GIS assets to address causes of leakage.	Mass of SF6 removed/ replaced/ refurbished (kg)	0	638.68kg removed. 30,625.85kg refurbished to reduce leakage	SF6 remains our largest single emissions source. Maintaining and improving on progress to date is essential for meeting our science based target and Ofgem requirements. These actions will reduce the harmful impacts associated with around half our current SF6 inventory over the course of T3, addressing a key source of Scope 1 emissions.	£93.66m	T3 (plus ongoing headcount from T2)

[1] This target relates to the delivery of our ASTI and T3 projects and therefore the cost of delivering this target is the total cost of all ASTI and T3 investments. To avoid duplication, these figures are not included here.

	2.b) Rollout energy monitoring for 100% of substations by 2030	Integrated Condition Performance Monitoring (T3-EJP-035). As part of this EJP installing condition-monitoring equipment, we are installing energy consumption monitors and associated communication equipment to achieve 100% coverage of our substation electricity consumption by the end of RIIO-T3.	% of substation sites with energy consumption monitoring	57.00	100.00	Substation electricity use is estimated to be a significant source of emissions but a lack of accurate data hampers action to reduce emissions. Measuring this consistently across our network will allow for more targeted interventions to reduce emissions.	£33.44m	T3 (Note that only a portion of this spend relates directly to this initiative. An estimated £0.98m from this project will provide 40 LV Energy Monitors for substations)
	2.c) EV Chargers (T3BP-EJP-039)	Expanding provision of EV chargers across our substation fleet to support transition to electric vehicles.	Substation sites with EV chargers	32.00	48.00	This action supports the electrification of our fleet of vehicles, enabling emissions savings for operational transport and Scope 3 transport emissions.	£14.99m	T3
3. Reduce Scope 3 GHG emissions in line with best practice standards	3.a) Low Carbon Construction Fund	Funding for the cost premium associated with low-carbon materials.	% emissions savings compared with baseline	-	30-35	This use-it-or-lose-it fund will enable the purchase of low carbon materials for capital projects, and therefore will result in Scope 3 emissions savings compared with carbon baselines. The fund will enable the purchase of both known emissions reduction options such as low carbon concrete, as well as the purchase and market stimulus of less established alternatives such as low carbon conductors. This market stimulus is likely to lower costs for low carbon materials in the medium- to long-term.	£140m	T3 (UIOLI, refer to RIIO-T3 Uncertainty Mechanism Framework for more information)

	3.b) PAS2080 verification	Funding for resource and tools to align with the PAS2080 standard for carbon management in buildings and infrastructure and achieve external verification by 2028	Verification of alignment (y/n)	No	Yes	Alignment with this standard will support the management of our Scope 3 emissions, enabling us to make emissions savings wherever possible, and to manage any emissions increase as we grow the network. This will support our requirements for our Science Based Target and Ofgem's requirements on measuring and reporting on Scope 3.	£0.36m	T3 (CAI, headcount accounted for separately)
	3.c) Transmission losses	By 2030, reduce the carbon intensity of our transmission losses by 50%	% losses against baseline	TBD	50.00	Whilst transmission losses are decreasing in their materiality from a carbon perspective, this action will reduce the carbon intensity of losses across T3.	£0	T3 (losses considered in broader decision making and therefore no costs included in this plan)
4. By 2025, develop position on a long term net zero target	4.a) Net zero position paper	By 2025, develop a cost benefit position paper on whether and how to set a net zero emissions target.	Paper completed (y/n)	Yes	Yes	This action will establish our long-term position on net zero, enabling stakeholders to have certainty.	£0	This action will be completed in T2, using existing resource
5. By 2027, assess nature carbon impacts consistently with other Transmission Operators	5.a) Nature carbon impacts	Funding for resource and consultancy support to work in partnership with other TOs and experts to develop and implement a standard methodology to assess our nature carbon impacts in line with evolving best practice.	Assessment complete (y/n)	No	Yes	Our activities are likely to have significant impacts (both positive and negative) on nature carbon, both on land and in the marine environment. This action enables us to measure these impacts for the first time, enabling more informed decision making and more transparent reporting.	£0.1m	T3 (CAI, headcount accounted for separately)

6. By 2027, establish world-class climate risk, resilience and adaptation approach	6.a) Climate risk assessment and reporting	Funding for resource and consultancy support to build on global best practice standards to assess and report on physical and transition risks to the SSENT, including but not limited to assets.	Best practice alignment (y/n)	No	Yes	As the impacts of climate change become more severe, stakeholders increasingly expect us to have a mature approach to climate risk assessment and to climate adaptation and resilience. Areas for development include greater use of scenario analysis, financial quantification of risk, an expansion of our climate risk assessment from assets only (“physical” risks) to cover both physical and transition risks. This piece of work will also include working towards accreditation against key standards on adaptation.	£0.25m	T3 (CAI, headcount accounted for separately)
	6.b) Climate tipping points assessment	Funding to develop a partnership with other TOs, academic institutions and others to explore how to take account of climate tipping points and cumulative impacts in climate risk assessments	Assessment complete (y/n)	No	Yes	This action enables us to work with leading climate risk experts to assess potential risks of cumulative impacts and tipping points, and to plan actions to mitigate these risks as far as possible. This action also makes a key contribution to the science of climate risk and adaptation, and to the energy industry’s understanding of these risks.	£0.15m	T3 (CAI)
	6.c) Climate resilience strategy update	Funding for external support to inform an update of our business-wide climate resilience and adaptation strategy	Strategy updated (y/n)	No	Yes	Updating our climate resilience and adaptation strategy is a natural follow-on step from improving risk assessments and taking account of tipping points and cumulative impacts.	£0.1m	T3 (CAI)

7. Natural capital impacts are considered in 100% of design decisions and developments by 2030	7.a) Nature impact assessment tool	Funding for resource and consultancy support to assess the impacts on nature from the materials and construction methods we use. This will build on an innovation project underway with other TOs to assess the impacts of materials and construction methods on nature, including cumulative impacts.	Assessment complete (y/n)	No	Yes	This action will support improvements to the ways we assess and manage our impacts on nature, and ensure these methodologies are aligned with other TOs. This action will also support nature reporting, in line with best practice (see actions 26.d) and 26.e)	£0.12m	T3 (CAI, headcount accounted for separately)
	7.b) Natural capital accounting	Funding for expert resource in natural capital to ensure we consider natural capital in design decisions by incorporating natural capital accounting into our impact assessments.	Project completed (y/n)	No	Yes	This action will support considerations of natural capital as standard elements of design decisions, enabling better decision making and reduced negative impacts.	£0	T3 (headcount accounted for separately)
8. Protect irreplaceable habitats and deliver no net loss of woodland	8.a) Irreplaceable habitat	Funding for ongoing resource and delivery of IH programs	% of projects delivering on commitment	TBD	100	We have a duty under planning guidance to protect irreplaceable habitat. As we grow the network, the potential for impacting irreplaceable habitats increases, meaning additional efforts must be made compared with previous price control periods. We will deliver this action in partnership with relevant organisations such as NGOs and small landowners, delivering additional benefits, and will seek co-benefits with partners.	£86.5m	T3 (CAI, headcount accounted for separately) and ASTI project costs

	8.b) Compensatory planting	Funding for continuing to deliver no net loss of woodland through compensatory planting (ongoing)	% of projects delivering on commitment	TBD	100		£50m	T3, ASTI, LOTI
9. Deliver 10% biodiversity net gain and leave a positive legacy for nature	9.a) Biodiversity net gain	Funding for delivery of 10% biodiversity net gain on all projects gaining consent (ongoing)	Total portfolio % BNG delivered	10.00	10.00	Delivering biodiversity net gain (BNG) is necessary to gain planning consent for capital projects. Delivering at least 10% BNG maintains industry leadership whilst balancing cost efficiencies, given the anticipated increase in costs related to securing land for BNG activities. BNG activities ultimately deliver nature restoration at scale, leaving the natural environment in a net positive state. We will deliver this action in partnership with relevant organisations such as NGOs and small landowners, delivering additional benefits, and will seek co-benefits with partners.	£160m	T3 and ASTI
	9.b) BNG monitoring and maintenance	Funding to monitor and maintain restoration sites both on SSENT-owned land and on land owned by partners, implementing new data management system by 2026.	Project completed (y/n)	No	Yes	Once BNG activities have been undertaken, the sites must be appropriately maintained and monitored over the long term to ensure genuine net gain, and to protect the sites from harm. This action will deliver improved data management systems and additional resource to ensure ongoing monitoring and maintenance.	£5m	T3 (CAI, headcount accounted for separately)

	9.c) BNG governance	Update governance approach to manage funding for restoration, monitoring and maintenance ensure ongoing protection of restoration sites by 2026.	Project completed (y/n)	No	Yes	Our governance of restoration activities requires an increasingly mature approach, including pooling funds to enable more strategic decisions on restoration, monitoring and maintenance. New governance structures will support BNG activities as well as species and habitat restoration and marine restoration work.	£0	T3 (continuing headcount from T2)
	9.d) Species and habitat restoration	Funding to undertake location-specific restoration initiatives for key species and habitats, targeting action at species and habitats most impacted by development, drawing on EIA findings.	£ allocated per year	0	26.7m	This target supports nature restoration outside of the strict criteria associated with meeting BNG requirements. For example, while BNG requires long timescales for benefits to be fully realised, shorter term actions can also be beneficial for habitats and species. Similarly, BNG is solely focused on habitat restoration and does not focus on species-specific initiatives. This approach (also described as “additional conservation actions”) aligns with global best practice on nature restoration. This target allows for projects that support particular species. The target supports both project-related initiatives and initiatives related to existing assets, including substation initiatives. A use-it-or-lose-it fund enables funds to be drawn down as specific opportunities arise, providing value for money.	£26.7m	T3 (UIOLI fund)

10.Be industry leaders in marine habitat monitoring and restoration by 2030	10.a) Marine BNG - metric development	Funding to support collaboration with other TOs and experts across the UK to lead on the development and adoption of an agreed methodology for measuring Net Gain in the marine (MNG) environment by 2027.	Project completed (y/n)	No	Yes	At present, there is no agreed metric to assess marine biodiversity or its restoration as exists for terrestrial habitats. This action aims to lead the development of agreed metrics for this emerging field, enabling accurate impact assessment and benefit mapping associated with marine restoration works.	£0.1m	T3 (CAI, headcount accounted for separately) and ASTI project costs
	10.b) Marine BNG - Oyster restoration	Funding to develop and implement a regionally appropriate Native Oyster restoration project aiming for 20 million oysters by 2030. Research led project to develop the skills and techniques necessary to deliver native oyster restoration at scale in the UK, and subsequently implement at scale	Oysters released	-	20,000,000	This action will deliver multiple benefits to the marine environment, the climate, the marine science and research community, and to coastal communities. The project will support the development of marine restoration skills and techniques, adding to the Scottish, UK, and global knowledge base, whilst oyster restoration at scale can provide carbon benefits (to be assessed and quantified through this project) water pollution reduction, habitat creation, and climate resilience building.	£18m	T3 (CAI, headcount accounted for separately) and ASTI project costs
	10.c) Marine BNG - Seagrass restoration	Research led project to develop the skills and techniques necessary to deliver seagrass restoration at scale in the UK, and subsequently implement at scale	Seagrass seeds sown	-	250,000,000	This project will provide benefits for the climate, nature, and communities, whilst supporting jobs in the marine sector. Seagrass provides significant carbon sequestration potential, whilst strengthening marine ecosystems and providing habitats for other species, including threatened marine	£18m	T3 (CAI, headcount accounted for separately) and ASTI project costs

						species. The research involved in this project will also support jobs and contribute to marine science.		
	10.d) Marine BNG - skills and workforce development	Funding to develop and run Marine Habitat Restoration Academy	Academy courses run	-	12.00	Marine habitat restoration is a specialist skillset for which the UK has a growing need. To enable marine restoration at scale, these skills need to be shared and developed by more people to enable a local marine restoration workforce to support our future work and that of others across Scotland and the UK.	£6.2m	T3 (CAI, headcount accounted for separately) and ASTI project costs
	10.e) Marine BNG - research and monitoring	Funding for work with partners to implement use of Distributed Acoustic Sensing (DAS) to monitor habitat restoration / recovery.	Monitoring sites established	-	4.00	This target supports accurate monitoring of the marine environment to enable assessment of the impacts of our activities and our restoration works. The action also contributes to shared knowledge of benefit to the offshore energy industry and to other marine industries.	£2.25m	T3 (CAI, headcount accounted for separately) and ASTI project costs
11. Assess contaminated land sites by 2030	11.a) Contaminated land site surveys	Undertake detailed site surveys for all sites where contaminated land risk has been identified by 2030	Project completed (y/n)	No	Yes	This action builds on work undertaken in T2 to assess sites for contaminated land, providing a greater level of detail to enable mitigation works to be planned and undertaken in T4.	£7.25m	T3 (NOCs and CAI, with headcount accounted for separately)
12. Deliver excellent, externally accredited community engagement	12.a) Stakeholder engagement	Maintain and continue to improve our AA1000 accredited community engagement approach, including by deploying	AA1000 accreditation maintained (y/n)	Yes	Yes	This action supports our aims of minimising impacts and sharing benefits with communities, ensuring the way we engage with	£0	T3 (CAI, headcount accounted for separately)

		our stakeholder engagement strategy.				communities meets the highest global standards.		
13. Better understand and manage our impacts on communities	13.a) Visual impact improvements	Funding for resource and consultancy support to establish a methodology to assess visual amenity and visual impacts of our assets outside of national parks and designated areas, with a view to reducing our cumulative impacts on visual amenity. Funding for Landscape Enhancement Initiative UIOLI.	Project completed (y/n)	No	Yes	Our network has impacts on visual amenity, but we do not yet have a detailed understanding of the cumulative impacts we have on visual amenity across the country. This action will deliver benefits by enabling better design decisions and minimising any visual impacts experienced by communities. In addition, the Landscape Enhancement Initiative use-it-or-lose-it fund will enable us to act on the findings of our assessment, and to enhance local landscapes for the benefit of people and nature.	£12.08m	T3 (£0.08m in CAI, headcount accounted for separately; £12m in UIOLI)
14. Deliver our community benefit fund from 2024 and support communities to access funding for local priorities	14.a) Community Benefit Fund	Launch Community Benefit fund that meets regulatory guidance fully launched by Spring 2025.	CBF launched (y/n); £ allocated per year, and since launch	Yes; TBD	Yes; TBD	Our Community Benefit Fund will allow a share of the benefits of our network expansion to go directly to those communities hosting new infrastructure. The fund is designed to bring substantial benefits and a positive, lasting legacy through local and regional initiatives across the north of Scotland.	c£70m	T3, ASTI, LOTI (exact costs TBD depending on final determination from UK Government)

15. Leave a positive community legacy by delivering hundreds of homes by 2030	15.a) Housing Strategy	Launch Housing Strategy by end 2024. Deliver serviced sites in partnership with housing sector stakeholders for use in future housing development and contribute to the development or restoration into the housing market of hundreds of homes across our network area by 2030.	Number of homes delivered through our investment program	0	TBD	Our Housing Strategy will drive the building and refurbishment of hundreds of homes across the north of Scotland, enabling us to house workers safely, efficiently, and sustainably as we grow the network, and supporting communities through the provision of homes, delivering a lasting legacy for the north of Scotland.	TBC	T3, ASTI and LOTI project costs
16. Enhance supplier data capture and analysis, ensuring 100% of suppliers provide required data	16.a) Embed sustainable procurement processes	By 2025/26, update Sustainability Works Information, streamline supplier KPIs across the business, standardise PQQ and ITT questions and develop selection of additional procurement questions for specific project types.	Project completed (y/n)	No	Yes	These actions support our aim of aligning with ISO 20400 which is the global standard for sustainable procurement. This will help ensure that our procurement of goods and services provides additional benefits for people, the environment, and the economy.	£0	T3 (CAI, headcount accounted for separately)
	16.b) Identify and share sustainability best practice	Develop example sustainability opportunity/best practice library and share with suppliers. Provide templates and clear guidance for suppliers on how and when to submit opportunities.	Project completed (y/n)	No	Yes	This target aims to more effectively share good practice between SSENT and our supply chain, and to inform project level sustainability assessments and action plans whilst driving supplier performance.	£0	T3 (CAI, headcount accounted for separately)
17. Engage with supply chain to identify opportunities for sustainability leadership	17.a) Supplier engagement on sustainability	>80% of suppliers by spend engaged on sustainability by 2026	% of suppliers engaged	TBD	>80%	This target supports our Supplier Relationship Management (SRM) program and is a continuation of our T2 commitment on sustainability	£0	T3 (additional and ongoing headcount accounted for separately)

						engagement with the supply chain. It supports our ongoing Scope 3 target around supplier engagement, and drives continuous improvement for both SSENT and our suppliers.		
18. By 2027, achieve external verification of alignment with ISO standard for sustainable procurement	18.a) Update sustainable procurement guidance	Update Sustainable Procurement Guidance for Transmission to ensure 100% of tenders for onshore and offshore projects over a value of £40m have weightings of no less than 20% for sustainability and social value (combined), rising to >30% by 2030	Average sustainability and social value weightings in tenders	TBD	>30%	This action will update our approach to weighting sustainability and social value in procurement practices to align with best practice across the UK. This target builds upon examples of good practice within SSENT and extends our ambition by setting a stretch target for the end of the T3 period.	£0	T3 (CAI, headcount accounted for separately)
	18.b) Align with ISO20400 on sustainable procurement	Achieve external verification of alignment with ISO20400 principles, undertaking training and a gap analysis to assess current practice against the standard and identify opportunities for improvement. Develop and implement improvement plan. Secure external verification of alignment.	Standard achieved (y/n)	No	Yes	ISO 20400 is the Sustainable Procurement standard to which SSE Group has aligned. By ensuring that SSENT embeds alignment with this standard, we will deliver best practice and leadership in sustainable procurement.	£0.08m	T3 (CAI, headcount accounted for separately)
19. Identify and realise circular economy opportunities, ensuring zero waste to landfill by 2026.	19.a) Inventory management and asset reuse	By 2025, rollout internal Transmission tools for inventory management and to assess quality and performance of existing assets for potential reuse.	Methodology developed (y/n)	No	Yes	This action enables the assessment of the quality and performance of existing assets to enable their reuse within the network, whilst maintaining safety and quality standards. It supports circular economy goals without impacting on network	£0	T3 (CAI, headcount accounted for separately)

						reliability. The action allows us to optimise the use of existing materials and assets, and thus avoid procuring additional inventory. In doing so, we can make cost efficiencies whilst also reducing our environmental impacts.		
	19.b) Zero waste to landfill & recycling rates	Undertake audits to assess alignment with target of generated zero avoidable waste to landfill and delivering>70% of waste recycled by 2026, rising to 80% by 2030	% of waste sent to landfill; % of waste recycled	1.5% to landfill; 68% recycled	0%; 80%	This action builds on our T2 target and sets a stretch target to go from 70% to 80% recycling rate by 2030.	£0.1m	T3 (CAI, headcount accounted for separately)
	19.c) Whole life assessment for materials and assets	Ensure 100% of design decisions include aim to reduce waste and consider end-of-life destination for materials and assets.	% of design decisions meeting target	TBD	100	By considering the impacts of our assets and materials at the end of their lives (40+ years for many assets), we can plan to reduce impacts and design out waste at source. There may also be cost efficiencies in doing so as we could reduce the cost of disposal of assets and materials at the end of their lives.	£0	T3 (continuing headcount from T2)
20. By 2027, deliver local social and economic benefits on every project, and strive to maximise suppliers located in the north of Scotland	20.a) Demonstrate social value	By 2027, demonstrate social value created in large capital projects, using consistent metrics, tools, and methodologies, and a shared approach with other TOs	Project completed (y/n)	No	Yes	Planning consent already requires local social and economic benefit to be delivered. This target ensures that such benefits are measured and quantified in a consistent way, enabling us to calculate and demonstrate the total benefits delivered through our large capital projects.	£0.02m	T3 (CAI, headcount accounted for separately)

	20.b) Maximise local suppliers	Strive to maximise suppliers located in the north of Scotland	Number and % of suppliers located in the north of Scotland	TBD	TBD	This target builds upon our T2 target for 25% local content and broadens its scope, driving a maximisation of opportunities for local suppliers wherever possible, enabling a positive legacy for local economies.	£0	T3 (CAI, headcount accounted for separately)
21. Review and refresh human rights due diligence approach by 2027	21.a) Human rights due diligence	Implement a refreshed approach to human rights and modern slavery due diligence with key suppliers by 2027	Project completed (y/n)	No	Yes	Human rights in our supply chain is a topic which is likely to grow in materiality in coming years and therefore presents a potential risk. By reviewing and refreshing our approach we will minimise risks.	£0.1m	T3 (CAI, headcount accounted for separately)
22. Develop and implement a Just Transition Workforce Plan by 2026	22.a) Just Transition Workforce Plan	Funding for ongoing resource to deliver Just Transition Workforce Plan	Project completed (y/n)	No	Yes	The plan will set out our approach to how we will attract, retain, and develop our workforce in a way that is consistent with Just Transition principles. This helps us to align with Scottish and UK Government priorities and supports the maintenance of our social license to operate.	£0	T3 (continuing headcount from T2)
	22.b) Employee engagement	Develop and deploy a refreshed employee engagement strategy, including engagement with former high-carbon workers	Project completed (y/n)	No	Yes	SSENT has a high proportion of recent employees joining the business from high carbon industries. This target builds on existing plans to deploy a refreshed employee engagement strategy for SSENT and ensures that former high carbon workers receive targeted engagement.	£0	T3 (continuing headcount from T2)

	22.c) Talent attraction	Develop and rollout a refreshed talent attraction program to grow the skilled workforce needed now and into the future	Project completed (y/n)	No	Yes	This target builds upon existing plans for talent attraction, supporting network growth and enabling our Pathway to 2030 program.	£0	T3 (continuing headcount from T2)
	22.d) Talent development	Role out a refreshed talent development strategy to develop current and future talent, including sharing best practice in STEM engagement with supply chain partners and others.	Project completed (y/n)	No	Yes	This target is already underway and aims to shore up our future workforce, ensuring we can continue to deliver the energy transition in a just and responsible way which delivers social and economic benefit to the communities we serve.	£0	T3 (continuing headcount from T2)
	22.e) Nature workforce	By 2028, collaborate with partners to support, train, and support the nature workforce of the future.	Number of people supported	0	TBD	A key barrier to progress in the nature restoration space is a lack of specialist workers and experts with the necessary skills, particularly within our operating area. For example, there are very few experts in peatland restoration which is a material area for us. Without this workforce, our ability to meet our nature restoration aims and obligations is challenging. This target aims to fund or co-fund initiatives to train up the workforce of the future, thus supporting both our own workforce needs, as well as enabling green jobs within our operating area. Finally, we will embed diversity and inclusion aims in this action, supporting people into the nature workforce who may otherwise be excluded.	£0.12m	T3 CAI and continuing headcount from T2.

23. Build our capacity and capability in sustainability by 2027	23.a) Sustainability capacity building	Funding for ongoing resource to support a Sustainability training and development plan for SSENT, with appropriate resources for different roles and teams.	Plan implemented (y/n)	No	Yes	This target aims to improve knowledge, skills, capacity and capability in sustainability for team members across SSENT, with tailored resources for specific roles and teams.	£0	T3 (CAI, headcount accounted for separately)
	23.b) Volunteering for sustainability and community legacy	Work with SSE Group to refresh Transmission's approach to employee volunteering program by 2026, ensuring that >25% of employees use at least one volunteering day per year by 2027, and >50% by 2031.	% of employees using at least one volunteering day per year	c2.5%	50%	This target is a continuation and expansion of our T2 target and supports the SSE Group volunteering program. A more strategic approach to volunteering could deliver multiple benefits such as direct community benefits, as well as supporting consenting on projects, and improving employee engagement and wellbeing.	£0	T3 (continuing headcount from T2)
24. Continue to drive inclusion and diversity through a new SSENT I&D hub and census-informed diversity targets.	24.a) Inclusion and diversity hub	Launch the SSENT Inclusion and Diversity Hub by 2025 and continue to deliver a program of inclusion focused campaigns and activities including supporting the Inclusion and Diversity Committee	Hub launched (y/n)	No	Yes	This target is a continuation of T2 commitments and is already underway as part of our People Strategy. Driving inclusion and diversity within our workforce support sustainability goals and underpins talent attraction and retention.	£0	T3 (continuing headcount from T2)
	24.b) Diversity targets and supplier engagement	Increase the diversity of our workforce by adopting census-informed diversity targets, and by 2027 engage with key suppliers to do the same.	Targets established (y/n)	No	Yes	This target is a continuation of T2 commitments and is already underway as part of our People Strategy. Driving inclusion and diversity within our workforce supports sustainability goals and underpins talent attraction and retention. This target also supports our supply chain to improve alongside us.	£0	T3 (continuing headcount from T2)

25. By 2027, foster a wellbeing culture within SSENT and in partnership with our suppliers	25.a) Psychological safety and wellbeing	Achieve ISO 45003 on psychological health and safety at work and by 2028, engage with key suppliers to adopt the same standard.	ISO standard achieved (y/n)	No	Yes	The ISO 45003 standard on psychological health and safety at work is the best practice standard for supporting mental health and emotional wellbeing amongst our workforce. It includes actions related to stress and resilience and alignment with the standard would support a more resilient workforce through a time of growth and change in the business.	£0	T3 (continuing headcount from T2)
	25.b) Mental health and resilience	Work with key suppliers to develop a program of mental health support for SSENT staff and contractors, including mental health first aiders, stress and resilience workshops.	Project completed (y/n)	No	Yes	This target extends our safety mandate for suppliers by focusing on mental health and wellbeing, whilst also ensuring that we support our own employees to be healthy, well, and resilient.	£0	T3 (continuing headcount from T2)
26. Improve quality, accuracy, and analysis of sustainability data and processes, and align sustainability reporting with global best practice by 2027	26.a) Streamline sustainability data platforms	Streamline sustainability data platforms by mapping sustainability data sources and platforms across the business, assessing effectiveness, and streamlining where appropriate, including by developing or buying new platforms. Assess training needs and deliver training across SSENT as required.	Project completed (y/n)	No	Yes	Streamlining data into one platform will enable greater scrutiny, accessibility, and analysis and use of our data to support continuous improvement.	£0.5m	T3 (CAI, headcount accounted for separately)
	26.b) Improve sustainability data systems and processes	Improve the quality and accuracy of sustainability data across all SSENT assets, operations, and projects.	Project completed (y/n)	No	Yes	This action builds on the initiative to streamline our data, by ensuring our data processes support accurate and actionable data.	£0	T3 (continuing headcount from T2)

	26.c) Sustainability Assessment and Action Plan improvements	Improve Sustainability Assessment and Action Plan process to identify sustainability and social value opportunities as early as possible in project lifecycles.	Project completed (y/n)	No	Yes	Refreshing our Sustainability Assessment and Action Plan template and developing bespoke SSENT resources will improve the process and support greater sustainability on LCPs.	£0	T3 (continuing headcount from T2)
	26.d) Natural capital baselining	By 2027, baseline natural capital assets on land owned by SSENT, by establishing standard methodology for calculating natural capital.	Natural capital baseline established (y/n)	No	Yes	Baselining the natural capital assets on land we own will support broader goals around reporting and could enable the issuance of green bonds to drive investment in our activities. This action also aligns SSEN Transmission with the other TOs and will support the aims of action 26.e).	£0.94m	T3 (CAI, headcount accounted for separately)
	26.e) Nature reporting improvements	By 2026, develop nature reporting in line with global best practice. Assess global best practice and agree approach to nature reporting, such as aligning with TNFD, SBTN and others (such as ESRS reporting) . Incorporate approach into future Annual Sustainability Reporting.	Project completed (y/n)	No	Yes	Stakeholders increasingly expect us to report in line with global standards such as the Taskforce for Nature-related Financial Disclosures. This target also allows us to explore whether a science based target for nature is appropriate for us, as this would require aligning with SBT standards for nature reporting.	£0.15m	T3 (CAI, headcount costs detailed separately)
	26.f) Sustainability reporting improvements	By 2027, develop sustainability reporting improvement plan, aligning to global best practice and SSE Group requirements.	Project completed (y/n)	No	Yes	By aligning with global best practice, voluntary standards, and incoming regulatory requirements such as the European Sustainability Reporting Standard, we provide stakeholders with transparency, clarity, and actionable information to inform decision making.	£0	T3 (continuing headcount from T2)

27. By 2030, assess our impacts on planetary boundaries	27.a) Planetary boundaries budget	By 2026, establish academic partnership with planetary boundaries experts to quantify SSENT's allocation of a planetary boundaries budget.	Partnership established (y/n)	No	Yes	Assessing a fair allocation of planetary boundaries budget for our business will allow for a credible measurement of our performance against this budget (see 27.b). This action also makes a significant contribution to scientific knowledge in the fields of earth sciences, and sustainable business.	£0.15m	T3 (CAI, headcount costs detailed separately)
	27.b) Planetary boundaries impact assessment	By 2030, assess SSENT's performance against planetary boundaries budget and publish performance.	Assessment complete (y/n)	No	Yes	By assessing our performance against planetary boundaries, we can demonstrate sustainability leadership by pioneering the measurement of business impacts against planetary boundaries. In turn, this will inform future sustainability impact assessments.	£0.2m	T3 (CAI, headcount costs detailed separately)

Appendix 2 – Impact assessment and counterfactual

The tables below meets the Business Plan Guidance requirement to include an assessment of the network's potential environmental impacts in RIIO-3 without intervention, in comparison to its current impacts. Such a comparison is not possible for every target and action in this SAP due to a lack of robust and credible methodologies for assessing counterfactuals. In addition, many actions relate to statutory obligations or consenting, and viable 'no action' counterfactuals do not exist.

A. **Impact of EAP initiatives at end of RIIO-3 – Scope 1 and 2 emissions**	**B. Lower bound - Measure under BAU in the final year of RIIO-3 (without RIIO-3 initiatives)**	**C. Upper bound - Measure under BAU in the final year of RIIO-3 (without RIIO-3 initiatives)**	**D. Lower bound - Measure in the final year of RIIO-3 (with RIIO-3 initiatives)**	**E. Upper bound - Measure in the final year of RIIO-3 (with RIIO-3 initiatives)**	**F. Initiative identifier (any initiatives contributing to change in impact)**	**G. Unit**	**H. Notes**
Total - Scope 1	3,694.04	4,589.68	2,875.23	3,770.87	2.a) Peterhead Circuit Breaker Replacement (T3BP-EJP-017) 2.a) Fort Augustus 132kV Bus Coupler Circuit Breaker Replacement (T3BP-EJP-008) 2.a) Mybster Switchgear Removal (T3BP-EJP-014) 2.a) Kinlochleven Switchgear Replacement (T3BP-EJP-011) 2.a) Shin Substation 132 Circuit Breaker Replacement (T3BP-EJP-019)	tCO2e	We have four scenarios for future Scope 1 & 2 GHG emissions, reflecting which types of interventions we will undertake. Capex-funded interventions, i.e. those funded through the RIIO-3 price control, are listed in column F. Opex-funded interventions are additional actions that we will undertake regardless of T3 funding decisions, i.e. ongoing SF6 repairs and ongoing transport fleet efficiencies and vehicle changes. Success in these areas will be required to reach our science-based target. The opex- and capex-funded interventions scenario that meets our science-based target is in Column D. A capex-only interventions scenario is in Column E. It is our most used scenario and matches Table 2. An opex-only interventions scenario is in Column B. A no-intervention baseline scenario is in Column C.

					2.a) OX36 Circuit Breaker Replacement (T3BP-EJP-016) 2.a) Errochty 132kV Circuit Breaker Replacement (T3BP-EJP-007) 2.a) GIS refurbishment (T3BP-EJP-026) 2.c) EV Charging (T3BP-EJP-039)		
Total - Scope 2 (Losses)	-	-	-	-	No funded initiatives targeting Transmission losses.	tCO2e	We do not forecast emissions from Transmission losses as we include them within our Scope 3 footprint.
Total - Scope 2 (Other)	1,599.99	1,613.02	1,599.99	1,613.02	Substation energy monitoring (part of 2.b) Integrated Condition Performance Monitoring (T3-EJP-035)	tCO2e	We have no capex-funded initiatives that will reduce Scope 2 emissions. The difference between the scenarios comes from an overall reduction in miles travelled and therefore a reduction in Scope 2 emissions from EVs.
Total Emissions	**5,294.0**	**6,202.7**	**4,475.2**	**5,383.9**		tCO2e	

A. Impact of EAP initiatives at end of RIIO-3 - Embodied carbon of new projects	B. Lower bound - Measure under BAU in the final year of RIIO-3 (without RIIO-3 initiatives)	C. Upper bound - Measure under BAU in the final year of RIIO-3 (without RIIO-3 initiatives)	D. Lower bound - Measure in the final year of RIIO-3 (with RIIO-3 initiatives)	E. Upper bound - Measure in the final year of RIIO-3 (with RIIO-3 initiatives)	F. Initiative identifier (any initiatives contributing to change in impact)	G. Unit	H. Notes
Manufacture	92.55	98.40	92.55	98.40	No change	%	In the RIIO-T3 period, initiatives to reduce emissions will be focused across capital carbon i.e. the manufacture, transport and construction stages, depending on the type of project. It is therefore unlikely that the general percentage contribution from each of the lifecycle stages would change from the typical values seen in 2024. These figures will be updated accordingly as we collect more data from construction-related emissions sources.
Transport	1.60	7.45	1.60	7.45	No change	%	As above.
Conductor	2.85	10.93	2.85	10.93	No change	tCO2e / unit	Upper and lower bounds determined from a range of different conductor types we typically use. Following carbon hotspot analysis, overhead line conductors did not appear as primary carbon hotspots. We do not anticipate these being an area of focus for RIIO-T3 interventions as reduction efforts should be placed on our highest emissions sources to maximise savings. However opportunities may become available to reduce emissions arising from conductors through individual projects as PAS 2080 is implemented. Emissions factors cover emissions arising from raw material extraction, transport to manufacturing site, manufacturing process and transport to project site. Unit = circuit km

Transformers	325.68	1,108.30	325.68	1,108.30	No change	tCO2e / unit	Upper and lower bounds determined from a range of GTs and SGTs we typically use. Following carbon hotspots analysis, transformers did appear as a primary carbon hotspot. We do not forsee capital carbon emissions reductions being possible for these assets as there is only a limited number of manufacturers who supply them and their focus is currently placed on reducing operational emissions from IIG leaks. Emissions factors cover emissions arising from raw material extraction, transport to manufacturing site, manufacturing process and transport to project site. Unit = number of GTs and SGTs
Towers and fittings	37.50	468.31	17.03	212.67	Capital Carbon Reduction Fund	tCO2e / unit	Upper and lower bounds range is significantly large as there are over 150 different types of towers, each of different weight. As we begin to roll out our Project Carbon Calculator across all projects we will refine this range to reflect tower types we commonly use. Following portfolio carbon hotspot analysis, towers did appear as a primary carbon hotspot. "With initiatives" estimates show the impact of switching the steel used in our towers from 5% recycled content to 100% recycled content, corresponding emissions reductions from baseline would be up to 55% per tower. Emissions factors cover emissions arising from raw material extraction, transport to manufacturing site and manufacturing process. Unit = number of towers

Cable	60.57	166.06	60.57	166.06	No change	tCO2e / km	Upper and lower bounds determined from a range of different cable voltages. Includes underground XLPE cable only. Following portfolio carbon hotspot analysis, underground cable did not appear as a primary carbon hotspot. We do not anticipate these being an area of focus for RIIO-T3 interventions as reduction efforts should be placed on our highest emissions sources to maximise savings. However opportunities may become available to reduce emissions arising from cable through individual projects as PAS 2080 is implemented. Emissions factors cover emissions arising from raw material extraction, transport to manufacturing site, manufacturing process and transport to project site. Unit = circuit km
Concrete	0.29	0.37	0.10	0.18	Capital Carbon Reduction Fund	tCO2e / km	Upper and lower bounds determined from a range of different concrete types (grades). "With initiatives" estimates show the impact of switching our concrete from CEM I to CEM III, corresponding emissions reductions from baseline would range from 52-66% per m3. Emissions factors cover emissions arising from raw material extraction, transport to manufacturing site and manufacturing process. Unit = m3

A. Waste	B. Lower bound - Measure under BAU in the final year of RIIO-3 (without RIIO-3 initiatives)	C. Upper bound - Measure under BAU in the final year of RIIO-3 (without RIIO-3 initiatives)	D. Lower bound - Measure in the final year of RIIO-3 (with RIIO-3 initiatives)	E. Upper bound - Measure in the final year of RIIO-3 (with RIIO-3 initiatives)	F. Initiative identifier (any initiatives contributing to change in impact)	G. Unit	H. Notes
Total waste weight	131,000.00	330,000.00	131,000.00	330,000.00	19.a), 19.b), and 19.c)	Kg	Our planned initiatives to reduce waste, increase recycling rates, and achieve zero waste to landfill focus on project level waste, including waste data audits and a revision of specifications to embed circular economy principles. As current project level waste data is not available, it is not possible to project anticipated total waste weights across the T3 period. Therefore, the figures shown here are a reasonable assumption about operational waste, based on historical minimum and maximum amounts of operational waste generated per person, combined with data on projected business growth over the T3 period (and without any planned interventions for operational waste).
Breakdown by source:							
New projects	n/a	n/a	n/a	n/a		%	
Business Operations	131,000.00	330,000.00	131,000.00	330,000.00	19.a), 19.b), and 19.c)	%	The figures shown here are a reasonable assumption about operational waste, based on projected business growth over the T3 period (and without any planned interventions for operational waste).
Breakdown of waste management:							
Recycling	70.00	70.00	70.00	80.00	19.a), 19.b), and 19.c)	%	Based on current recycling rates (for operational waste) and targets for T3 period
Landfill	1.50	1.50	1.50	-	19.a), 19.b), and 19.c)	%	Based on current landfill rates (for operational waste) and zero waste to landfill targets for T3 period
Landfill Diversion Other (e.g. energy from waste, landfill capping)	98.50	98.50	-	-	19.a), 19.b), and 19.c)	%	

Appendix 3 – How this plan meets Ofgem requirements

Index of Ofgem requirements and which targets and actions meet those needs.

Topic	Business Plan Guidance requirements	How this Sustainability Action Plan meets requirements	Initiative identifier(s)
Business carbon footprint	Adopt a science-based target to reduce their scope 1 and 2 BCF;	Target 2 in this Sustainability Action Plan is to "reduce Scope 1 and 2 GHG emissions by 46% by 2029/30 in line with a 1.5° warming limit". This remains a science-based target. We are committed to reporting on our BCF, including reductions in emissions made. Our BCF reporting is assured by an external body and covers all Scopes of emissions. We will continue to use the Science Based Target Initiative (SBTi) methodologies to inform target setting and we remain committed to engaging stakeholders in target setting wherever relevant and material.	2.a) Develop and deliver an IIG Strategy including targets for SF6 alternatives, leakage rate targets and innovation 2.b) Rollout energy monitoring for 100% of substations by 2030 2.c) EV Chargers (T3BP-EJP-039)
	Commit to efficient and economic actions to reduce their controllable BCF in RIIO-3; and		
	Commit to reporting on BCF reduction and progress towards science-based target and net zero using a common BCF methodology. Reporting should include reducing scope 3 emissions.		
	Where BCF targets are being developed or reviewed, we expect networks to work alongside their ISG to suggest science based targets in alignment with the Science Based Target Initiative (SBTi) methodology.		
Embodied carbon	Commit to monitoring and reporting on embodied carbon in new projects (projects beginning in the given price control period);	Target 3 in this Sustainability Action Plan is to "reduce Scope 3 GHG emissions in line with best practice standards". A key action to deliver this target is alignment with the PAS 2080 carbon management standard and verification of that alignment. In line with the PAS 2080 standard, we will monitor and report on embodied carbon in projects and collaborate with our supply chain to identify and implement opportunities to reduce embodied carbon in new projects during RIIO-T3.	3.a) Capital Carbon Reduction Fund 3.b) PAS 2080 verification
	Commit to collaborating with the supply chain on addressing challenges to reduce embodied carbon in the network;		
	Commit to establishing baseline and a target to reduce embodied carbon on new projects during RIIO-3; and		
	Set out what the materiality threshold should be for new projects that require reporting in this area.		

		All construction project works (civil, electrical, forestry, and mechanical) greater than £500,000 in value and/or eight (8) weeks duration are required to produce carbon management plans and to report on progress to identify and implement carbon reduction opportunities. The Low Carbon Construction Fund (initiative 3.a) will enable projects to cut embodied carbon by covering any additional costs of low carbon materials, assets, or construction methods where the cost of these is greater than using traditional approaches.	
Supply chain	Adopt high standards of environmental management in its supplier code, including requirements for public disclosure of metrics and cascading code to their suppliers that are material to the company's inputs; Adopt a target of more than 80% of suppliers (by value) meeting the code in RIIO-3; and Commit to reporting on actual percentage of suppliers (by value) meeting the code.	Our Sustainable Procurement Code embeds high standards of environmental management. In addition to this SSE-wide code, SSEN Transmission's Sustainability Works Information sets out requirements on suppliers in relation to sustainability reporting. Target 16 aims to enhance supplier data capture and analysis, ensuring 100% of suppliers provide required data. Target 17 commits us to engaging with supply chain to identify opportunities for sustainability leadership, and target 18 aims to achieve external verification of alignment with the ISO standard for sustainable procurement by 2027. We are committed to reporting on the percentage of suppliers meeting our Sustainable Procurement Code.	16.a) Embed sustainable procurement processes 16.b) Identify and share sustainability best practice 17.a) Supplier engagement on sustainability 18.a) Update sustainable procurement guidance 18.b) Align with ISO20400 on sustainable procurement
Resource use and waste	Update procurement processes to embed Circular Economy principles	Our Sustainable Procurement Code embeds the circularity principles of (1) eliminating waste, (2)	

	Adopt a target for zero waste to landfill by at the latest 20[XX] Adopt a target for recycled and reused materials as a percentage of total measurable materials where feasible by at the latest 20XX; and Adopt a target for commitments to reporting on actual waste to landfill, recycling and reuse as a percentage of total.	circulating products and materials and (3) regenerating nature. By embedding these principles into our operations we aim to minimise our environmental impact, enhance operational efficiency, strengthen resilience to resource shortages and create value for stakeholders. Target 19 of this Sustainability Action Plan sets out our goals on zero waste to landfill and recycling. It aims to "identify and realise circular economy opportunities, ensuring zero waste to landfill by 2026." Specific actions commit us to achieving zero avoidable waste to landfill by 2026 and recycling rates of 70% by 2026 and 80% by 2030. We will continue to report on actual waste generation and its destinations, and to improve our waste data, particularly for projects.	19.a) Inventory management and asset reuse 19.b) Zero waste to landfill & recycling rates 19.c) Whole life assessment for materials and assets
Biodiversity/natural capital	Adopt an appropriate tool to assess net changes in natural capital from different options for new connections and network projects; Set out what the materiality threshold should be for new connections and network projects that require reporting on natural capital; and Adopt an appropriate methodology/tool to measure and monitor changes in natural capital and ecosystem services provision and report regularly if a company has an EAP commitment or output delivery incentive that is directly linked to such measures in its RIIO-3 business plan/price control.	Targets 7, 8, 9, and 26 in this Sustainability Action Plan set out our goals on assessing the impacts on nature from our activities, including from capital projects; our aims relating to the protection and restoration of irreplaceable habitat and compensatory planting, biodiversity net gain and the measurement of natural capital. All construction project works (civil, electrical, forestry, and mechanical) greater than £500,000 in value and/or eight (8) weeks duration are required to produce sustainability plans and to report on progress to identify and implement sustainability opportunities.	7.a) Nature impact assessment tool 7.b) Natural capital accounting 8.a) Irreplaceable habitat 8.b) Compensatory planting 9.a) Biodiversity net gain 9.b) BNG monitoring and maintenance 9.d) Species and habitat restoration

Sulphur hexafluoride (SF6) & Other IIGs (ET only).	Strategy implementation in RIIO-ET3 to manage SF6 on the network. This should include economic and efficient actions to reduce leakage rates and, economic and efficient SF6 asset replacement; Adopt a target for SF6 leakage reduction; and Commit to reporting on total SF6 leakage reduction rates using a common TOs' methodology.	Target 2 in this Sustainability Action Plan is to "reduce Scope 1 and 2 GHG emissions by 46% by 2029/30 in line with a 1.5° warming limit" and a key action to achieve this goal is action 2.a) "Develop and deliver an IIG Strategy including targets for SF6 alternatives, leakage rate targets and innovation" The targets we set and activities we undertake will align with our emissions reduction target. As noted in Appendix 1, our planned activities in relation to this action include the removal of 638.68kg of SF6 from the network and the refurbishment of a further 30,625.85kg to reduce leakage. We will continue to report on SF6 leakage rates throughout T3.	2.a) "Develop and deliver an IIG Strategy including targets for SF6 alternatives, leakage rate targets and innovation
Transmission losses (ET only)	Commit to reporting on the progress of implementing the losses strategy and associated performance measures Contribute to the evidence base on the proportion of losses that network companies can influence/ control.	Target 3 of this Sustainability Action Plan requires an action to reduce the carbon intensity of our transmission losses by 50%. We will continue to report on transmission losses and associated carbon intensity throughout T3 and contribute to shared evidence where possible and appropriate, noting that our network has little to no control over transmission losses.	3.c) Transmission losses: Reduce the carbon intensity of our transmission losses by 50%

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