Attachment 5

Climate Risk Management Plan

V1.1 – Minor updates. July 2018

V1.2 – Removed references to Executive Order 13693, which was rescinded in May 2018

V.1.3 – Updated BT public website URL for Climate Change

V.1.4 Updated BT public information on recent climate change initiatives.

V1.5   Annual review and minor updates

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Document Control

Effective Date/Associated Documents	
Effective Date	31 July 2017
Associated Documents	• System Services Acquisition Policy

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Document Change History (minor number = draft changes; major number = final document)			
Version	**Date DD MMM YYYY**	**Full Name**	**Change Description**
1.0	February 2015	Brian Lamb	Completed initial version for EIS Proposal.
1.1	July 2018	Nick Matich	Reviewed. Minor revisions to correct typos, update contacts and web sites, add some specificity on internal reporting of environmental incidents.
1.2	August 2018	Nick Matich	Removed references to Executive Order 13693 which was rescinded in May 2018.
1.3	May 2019	Nick Matich	Modified BT public URL for Climate Change
1.4	July 2020	Nick Matich	Edited to remove older text and points of contact no longer valid. Added recent BT corporate initiatives in this area.
1.5	July 2021	Nick Matich	Minor edits.

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1.0   Climate Risk Management Plan [L.30.2.5; M.2.2(5); F.2.1 ID #84 - 86; G.12]
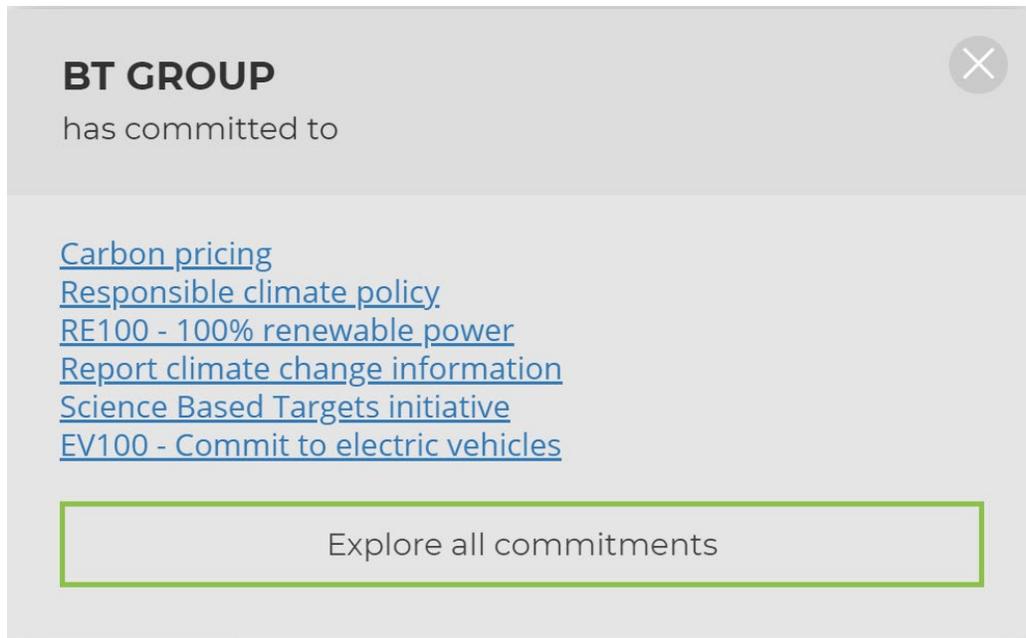
1.1.   Requirements for Climate Change Adaptation, Sustainability and Green Initiatives [G.12]

As a major supplier of Government services, BT has not only an opportunity, but also an obligation to practice good stewardship of our natural resources including the greatest use of environment-friendly resources and processes. To this end, we have developed plans and strategies to meet our ambitious goal of being a Net Good business in an environmental-friendly way. Our two main aims to achieve this are:

1. Reducing - By reducing the environmental impact of our operations, supply chain and customer solutions

2. Helping - By helping our customers and suppliers to reduce their own environmental impact

BT Group, the parent of BT Americas and BT Federal, is a member of the We Mean Business coalition, which coordinates business action and drives policy ambition to accelerate the zero-carbon transition.   BT Group is one of 139 companies worldwide to make CDP's A list. Below is an extract from the website https://www.wemeanbusinesscoalition.org/

BT GROUP
has committed to

Carbon pricing
Responsible climate policy
RE100 - 100% renewable power
Report climate change information
Science Based Targets initiative
EV100 - Commit to electric vehicles

Explore all commitments

BT complies with these goals and adheres to the following principles:

1. We have commitment to our goal at the highest level of the business. The Chief Executive of BT has ultimate responsibility for the company's environmental policy and performance

2. We will harness the capability, diversity, and innovation of our supply base to add value to our business

3. Expecting our suppliers to offer solutions, which have a reduced negative environmental impact

4. Conserving energy, limiting consumption and minimizing environmental impact in the delivery, usage and subsequent disposal of equipment is a major priority at BT

5. The energy consumption and negative environmental impact of any replacement product or service (from manufacture, through usage, to disposal) is to be less than its predecessor to the degree possible

6. Reducing the environmental impact of our operations, supply chain and customer solutions

7. Helping our customers reduce their own negative impact on the environment.

BT has an environmental policy, which is applicable to all our operations and reviewed regularly. BT updates and reports our performance against our sustainability improvement targets related to environmental impacts on a quarterly basis. BT's environmental policy underlines our firm commitment to ensuring compliance with the laws governing environmental management. Underpinning the policy is BT's environmental management system. The system effectively manages and helps to improve the quality of our processes, products and services and our impact on the environment in which we operate. This is part of our on-going commitments to corporate social responsibility, partnerships with the communities where we conduct our business, and to the philosophy of sustainable development. We review this policy annually to ensure it remains current. The following website provides BT's full Environmental Policy:

Here you can find specific information about the corporate commitments, points of contact, related to Climate Change.

Here is a partial list of the recent BT goals and accomplishments to combat carbon emissions and climate change.

- BT Group is committed to being a net zero carbon emissions business by 2045.
- As part of its approved science-based target, BT Group aims to cut its greenhouse gas emissions intensity by 87% by 2030, compared with 2016/17 levels and reduce its supply chain (scope 3) emissions by 29% by 2030 (from 2016/17 levels).
- To enable customers to reduce their carbon emissions by at least three times by 2020, when looking at the end-to-end carbon impact of their business.
- BT Group is committed to sourcing 100% of its electricity worldwide from renewable sources by 2020.
- BT Group aims to convert its 29,000 vehicles, which range from cars to heavy goods vehicles, to EVs where this is the best technical and economic solution. It will pursue other ultra-low emission solutions where electric vehicles are not viable.
- Between 1996 and 2019, BT Group has cut its scope 1 and 2 emissions by 80%.
- BT Group reduced its emissions from its direct operations and energy use (scopes 1 and 2) by 17% between 2018 and 2019 and by 26% between 2017 and 2018. The company's 2018/19 emissions were 298,461 tonnes CO2e, down from 377,000 in 2018 and 404,000 in 2017.
- Across its supply chain, BT Group reduced its emissions to 4,112,000 tonnes CO2e in 2018/19, down from 4,387,000 in 2018 (6% reduction) and 4,772,000 in 2017 (14%).
- BT Group's carbon emissions intensity reduced by over a quarter between 2016 and 2019.
- In 2019 BT Group used 2.24% less energy worldwide compared to the previous year.

Our progress

100%
renewable electricity worldwide, achieving our goal for 2021

£358m
saved since 2009/10 through our energy efficiency management programme

57%
reduction in the carbon intensity of our operations since 2016/17, on track to achieve our 87% goal by end of March 2031

29%
cut in carbon emissions across our global operations over the last year (Greenhouse gases scopes 1 and 2)

19%
cut in supplier carbon emissions since 2016/17, towards our expanded reduction target of 42% by end of March 2031

Expanded our 2045 net zero target to include our supply chain as well as our operations

BT has developed and will provide a Climate Risk Management Plan IAW Deliverable ID #84 that demonstrates BT's compliance with the climate change adaptation conditions described in Executive Orders and other applicable laws, regulations, and directives. BT will incorporate BT's environmental policies and goals in this document. BT will make our Plan available for agency use to support the Agency Adaptation Plans of agencies procuring services through this contract.

BT's Environmental Management System (EMS) is certified to the international standard ISO 14001 in multiple countries. Our EMS reporting covers 19 countries, representing more than 95 per cent of our employees and the bulk of our major energy-using operations.

There are nine areas of environmental risk managed under BT's EMS:

- Community Environmental Impacts (Specialist Assets)
- Community Environmental Impacts (Network Assets)
- Emissions to Air
- Energy
- Fuel
- Procurement
- Produce Stewardship
- Transport
- Waste

The Energy & Environment Unit regularly reviews BT's Environmental Policy and ensures effective reporting of risk through all line of business Audit and Risk Committees.

BT is currently leading the way among its competitors in the energy and carbon reduction space. In fact, we are the only major Telco to have reported over four years of consecutive energy reduction – our goal for this year is to achieve a 5th year of consecutive energy reduction.

Our energy reduction is in large part driven by the roll out of a smart energy management network across our business; and of rationalizing infrastructure in our data centers, networks and buildings.

Incidents, and near misses, are to be reported to the relevant aspect lead as stated below: (Specific Points of Contact are redacted from this document)

☐ **Waste and Natural Environment** – waste related issues and those affecting the natural environment – **Energy, Carbon and Water** – electricity, gas and water related issues and statutory reporting of carbon – **Emissions to Air** – refrigerant and f-gas management –**Fuel** – fuel and oil storage and generators –   **Transport** – management of the BT Fleet, vehicle and maintenance –

· **Procurement** – purchasing policy, supplier selection and supplier duty of care surveillance –

· **Product Stewardship** – products, including packaging, Restriction of Hazardous Substances (ROHS) Waste Electrical and Electronic Equipment (WEEE), Eco-design (REACH), batteries in our products and Energy Labelling. –

· **Community Environmental Impacts (Specialist Assets)** – specialist areas of subsea cables and masts and towers –

· **Community Environmental Impacts (Network Assets)** – the network external to BT premises; including cabling, access network, payphones and deep level tunnels –

Through training, every BT employee and supplier is aware of our goals; how we manage our environmental impacts, and how environmental compliance is relevant to the job they do for, and on behalf of BT. ISO 14001:2004 sets out the standards and criteria for an environmental management system. Using these standards provides assurance to company management, employees and external stakeholders that environmental impact is being measured and improved. The benefits include reduced cost of waste management, savings in consumption of energy and materials, lower distribution costs and improved corporate image among regulators, customers and the public.

Our suppliers are critical partners in our achieving our goals. Each Supplier must conform to BT Environment Policies.

. In 2014, the Better Future Supplier Forum won the Guardian Sustainable Business supply chain award (http://www.theguardian.com/sustainable-business/guardian-sustainable-business- awards-2014-winners), which recognized BT for supply chain innovation and for

initiatives that embed a respect for human, economic and environmental rights across a business or product's supply chain. Climate Change Adaptation [G.12.1; F.2.1 Deliverable ID #85].

BT will support GSA in implementing the applicable Executive Orders provided via EIS Change Orders by requiring Government contractors to comply applicable requirements and provisions. BT Federal will provide Corporate Sustainability Reporting on our or EIS web portal. BT Federal will publish Corporate Climate Sustainability Reports and additional information regarding our efforts to support sustainability on our portal. BT has an environmental policy that is applicable to all of our operations and reviewed regularly. BT's environmental policy demonstrates our firm commitment to ensuring compliance with the laws and recommendations governing environmental management.

BT welcomes the opportunity to partner with GSA and cooperate in this endeavor in our business relationship through the EIS Program. In support of this partnership, BT Federal has considered Climate change adaptation aspects in the design and operations of services that we will provide under this contract. We have prepared, and will update as needed our, Corporate Climate Risk Management Plans IAW Deliverable ID #84. The Climate Risk Management Plan will be made available for Government use to directly support the Agency Adaptation Plans of agencies procuring services at the TO level of this contract. This plan outlines BT Federal's current and future efforts to meet the requirements of this contract.

BT Federal acknowledges that these sustainability-related standards, including estimates of the lifecycle costs and environmental impacts of proposed solutions, apply at the TO level. BT Federal will provide sustainability reporting to GSA as requested and ensure that our disclosures are current and up to date.

BT Federal will make best efforts to comply with the climate change adaptation conditions described applicable Executive Orders as directed by GSA. .

BT Federal will incorporate climate change adaptation strategies into our risk-management programs to reduce property, infrastructure, and supply chain vulnerabilities. This includes identifying mission critical facilities, products and services, our relationships with our suppliers and customers. We will continuously evaluate our business operations and practices, and our supply chains that may be vulnerable and anticipate needs that may arise from climate change. We will support the climate change adaptation conditions described in applicable Executive Orders as directed by GSA.

BT Federal will prepare and update as needed this Corporate Climate Risk Management Plan. This Plan will be made available for agency use to directly support the Agency Adaptation Plans of agencies procuring services through this contract.

1.1.1. Corporate Sustainable Management Practices

1.1.2. Reporting to GSA on Sustainability

When requested by the CO or COR, BT will report to GSA

1.1.3. Task Order Level Applicability

Should a specific Task Order (TO) require incremental reporting that exceeds the reporting requirements stated above, BT will provide such reporting on a per Task Order basis.

1.1.4. Considerations for Design and Operations of EIS Services

1.1.5. Incorporation of Climate Change Adaptation Strategies into Risk Management Programs

1.1.6. Compliance with Executive Orders

Various Executive Orders (EO) regarding Climate Change and its impact guide our environmental policy. Where Executive Orders address the need to reduce the greenhouse gas emissions, we strive to meet the requirements. Climate risk is an important focus for any Partner, vendor, supplier that BT has engaged to provide quality mission support to Government agencies. This is accomplished through contractual terms and conditions incorporated into BT supply chain and procurement execution. We will also require compliance from our suppliers, teaming partners, and third-party providers to fully comply with existing laws and regulations governing climate change and green initiatives. We require that these partners provide reports of their compliance.

We have made significant progress toward meeting the goal of reducing paper use, and use paper products containing at least 30% postconsumer fiber. Our services feature a standard, multi-use portal for distribution of information. We also make maximum use of electronic transfer of reports, payments, receipts, and other records that traditionally were provided using paper copies. Our general principle is to hold paper copies to a minimum in the interest of efficiency and effectiveness. The intended result of this principle is the significant reduction in waste of paper. Our customers often observe, after a few billing and reporting cycles, the significant reduction in the use of paper and view this as a significant environmental benefit. Agencies will also benefit from the lower costs benefits and enhanced visibility into their billing data.

BT will support the climate change adaptation conditions described in applicable Executive Orders as directed by GSA. By nature of our existing sustainability and reporting policies, we align with the goals good being good environmental stewards. We continue to strive to achieve the same objectives commercially, be a major contributor to national greenhouse gas reductions, and support preparations for the impacts of climate change. We will work in partnership with the Government to build a clean energy economy that will sustain our prosperity and the health of our people and our environment for generations to come.

1.1.7. Annual Climate Change Adaptation, Sustainability, and Green Initiatives Report

BT will deliver our Climate Change Adaptation, Sustainability, and Green Initiatives Report to the GSA CO on an annual basis. The report will highlight our achievements and progress towards meeting our goals for sustainability and reduction of our negative impact on the environment. This report will also provide any changes made throughout the year to remain fully compliant with the federal directives mentioned above. We will deliver the report on schedule as provided in RFP Section F.2.1.

1.1.8. Notification of Non-compliance with Executive Orders, Laws, Regulations, and Directives

In addition to our annual progress reports, BT will inform GSA CO and the customer Agency representative(s) if conditions arise, or situations that may be out of compliance with stated regulations and EOs regarding climate change and green initiatives. We will provide this notification immediately upon our knowledge of such situations.

Upon awareness of non-compliance, with EOs, laws, regulations and directives, BT will immediately notify GSA and our customer agencies and identify plans and actions to achieve and maintain compliance.

1.2. Sustainability and Green Initiatives [G.12.2]

Offering Energy-Efficient Products

BT Federal recognizes the obligation to choose, whenever possible, energy-efficient products and services to the US Governmnent. When we offer Energy Star-certified, low standby power, or EPEAT- registered products, we will identify them as choosing energy-efficient products, BT will notify GSA, by model number and registration level of those products. Among many resources, BT leverages commonly available resources such as www.sftool.gov/greenprocurement and report to the Government where and how they are implemented.. BT understands the goal of the US Government and Agencies in improving data center energy efficiency. Because of both the environmental and financial benefits of these achievements, BT is continually working to meet the following goals on behalf of its Federal and global customers:

- Ensuring promotion and adoption of data center energy optimization, efficiency, and performance

- Establishing a power usage effectiveness target of 1.2 to 1.4 for new data centers.

1.2.1. Electronic Product Environmental Assessment Tool [G.12.2.1; F.2.1 #ID #85]

We will deliver a yearly Annual Climate Change Adaptation, Sustainability, and Green Initiatives Report. BT will send this report to GSA CO IAW Deliverable #ID #85 to the GSA CO that highlights. This report will highlight any changes made throughout the year to demonstrate that BT remains fully compliant with the Federal directives mentioned listed in the EIS RFP.

1.2.2. Energy Efficient Products [G.12.2.2]

Energy efficiency is an important requirement in BT's selection of equipment suppliers. We have experience with, and favor ENERGY STAR® products for all our Government and commercial customers. We have required our suppliers to specify the ENERGY STAR® rating of major electronic equipment. Our experience with these suppliers has been very positive in that these suppliers have offered energy-efficient (e.g., Energy Star-certified products or.

1.2.3. Data Centers and Cloud Services [G.12.2.3; F.2.1 ID #86]

BT currently meets Power Utilization Efficiencies (PUE) rating between 1.2 and 1.4 at facilities that host our equipment. We require our providers of data center and cloud services that support other parts of our infrastructure to adhere to the provisions of laws and regulations governing Green Initiatives and efficient power utilization. BT will provide annual reports of PUE of facilities used under this contract.

1.2.3.1. Power Utilization Efficiencies (PUE) Rating

BT currently meets Power Utilization Efficiencies (PUE) rating between 1.2 and 1.4 at facilities that host our equipment. However, BT Federal currently does not have data centers nor does it provide cloud services directly. We require our providers of data center and cloud services to adhere to the provisions of laws and regulations governing Green Initiatives and efficient power utilization. We require these service providers to meet PUE rating between 1.2 and 1.4 where and when environmental conditions allow meeting these requirements. In providing our services to the Government, we will make every effort to identify and utilize data center or cloud services that meet PUE between 1.2 and 1.4.

1.2.3.2. Annual PUE Report

Upon TO award and if required, BT will also provide a Power Utilization Efficiencies (PUE) Report IAW Deliverable ID #86 for our facilities used under this contract to serve TO. We will provide annual report subsequently.

Acronyms (L.22)

Acronym	Definition
CDP	Carbon Disclosure Project
EO	Executive Orders
FEMP	Federal Energy Management Program
GRI	Global Reporting Initiative
PUE	Power Utilization Efficiencies
TO	Task Order