



# Corporate policies for carbon impact



How Microsoft uses  
corporate environmental  
policy to increase  
accountability

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# Executive summary

Policy will play an essential role in global efforts to contain and mitigate the effects of carbon emissions and associated climate change. To date, the majority of environmental policy has been implemented through the public sector—in particular, governmental regulations mandating that organizations report their carbon emissions and, on occasion, pay fees or taxes based on those emissions. However, corporate environmental policies are playing an increasing role, empowering organizations to demonstrate their commitment to environmental responsibility and embed environmental factors into their business planning.

At Microsoft, we believe we have a responsibility to minimize our impact on the environment. As a global company, we have a unique opportunity to address climate change, a cross-border challenge requiring global corporate carbon policies with a portfolio of actionable initiatives. Climate change is also closely linked to other important sustainability issues such as water, biodiversity, public health and other socio-economic issues. We have voluntarily tracked and reported on our environmental footprint for years and, more recently, have implemented internal policies to drive accountability throughout our organization for our environmental goals and commitments. In particular, we have two new company-wide environmental policies:

 **Carbon neutral policy**—Be net carbon neutral for our data centers, software development labs, offices, and employee air travel through a program of investments in energy efficiency, renewable energy, and carbon offset initiatives.

 **Carbon fee policy**—Embed accountability for achieving carbon neutrality into the standard operations of our business by charging individual business groups for the carbon emissions associated with their use of data centers, software development labs, offices, and employee air travel.

With these policies, we have a framework in place to measure, manage, and reduce carbon emissions from our internal operations while supporting the market for clean energy and carbon offset projects.

# ■ Introduction

## The context: a climate of environmental reporting and legislation

Organizations today are affected on multiple fronts—from governmental regulation to industry pressure to voluntary internal corporate policy—by an increasing need to account for and report on their carbon footprint.

### The global reach of public policy

Today's global business environment is one that requires compliance with a number of emissions mandates. For example:

- 🌿 Australia has introduced a Clean Energy Act, which imposes a relatively expensive carbon tax of US\$24 per ton. This legislation, which affects the 300 most pollution-intensive companies in Australia, aims to mitigate the country's status as the highest emitter of greenhouse gas (GHG) per capita in the developed world.<sup>1</sup>
- 🌿 In Canada, British Columbia's Carbon Tax Act puts a price on carbon emissions to encourage individuals, businesses, industry and others to use less fossil fuel and reduce their greenhouse gas emissions. The initial tax rate was relatively low and has increased gradually to allow families and businesses time to reduce their emissions. This tax is also revenue neutral, meaning every dollar generated by the tax is returned to taxpayers through reductions in other provincial taxes.<sup>2</sup>

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<sup>1</sup> "Australia introduces controversial carbon tax," *British Broadcast News*, July 1, 2012, <http://www.bbc.co.uk/news/world-asia-18662560>

<sup>2</sup> "Carbon Tax Act: Carbon Tax Regulation," British Columbia, [http://www.bclaws.ca/EPLibraries/bclaws\\_new/document/ID/freeside/125\\_2008](http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/125_2008)

- 🌿 California's cap-and-trade program puts a price on carbon and covers major sources of emissions in the state—mainly factories and oil refineries. Beginning in 2013, 350 companies must comply with the program.<sup>3</sup>
- 🌿 In Europe, large energy-intensive industrial companies and airlines must comply with mandatory carbon emissions reporting under the European Union Emissions Trading System (EU ETS). The EU ETS represents approximately 11,000 power stations and industrial plants in 30 countries.<sup>4</sup>
- 🌿 Ireland charges a carbon tax on fossil fuels used by offices, homes, vehicles, and farms based on carbon emissions. In addition, households are charged a fee based on weight for any trash that is not recycled, and vehicles are subject to new purchase taxes and yearly registration fees based on emissions. Since 2008, Ireland's national emissions have dropped by more than 15 percent.<sup>5</sup>
- 🌿 In Japan, the Mandatory Greenhouse Gas Accounting and Reporting System captures emissions from 11,000 enterprises, representing almost half of the country's total emissions.<sup>6</sup>
- 🌿 The United Kingdom holds large companies accountable for their emissions under the terms of the Carbon Reduction Commitment (CRC) Energy Efficiency Scheme. These companies are responsible for approximately 10 percent of the country's emissions.<sup>7</sup>
- 🌿 The United Kingdom has also mandated that companies listed on the London Stock Exchange report their GHG emissions data for the year beginning in April 2013. The government expects the policy to

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<sup>3</sup> "Cap-and-trade program," California Environmental Protection Agency, <http://www.arb.ca.gov/cc/capandtrade/capandtrade.htm>

<sup>4</sup> "Emissions trading system (EU ETS)," European Commission Climate Action, [http://ec.europa.eu/clima/policies/ets/index\\_en.htm](http://ec.europa.eu/clima/policies/ets/index_en.htm)

<sup>5</sup> "Carbon taxes make Ireland even greener," *The New York Times*, December 27, 2012, <http://www.nytimes.com/2012/12/28/science/earth/in-ireland-carbon-taxes-pay-off.html?pagewanted=all&r=1&>

<sup>6</sup> Céline Kauffmann, Cristina Tébar Less, and Dorothee Teichmann, "Corporate greenhouse gas emissions reporting: A stocktaking of government schemes," *OECD Working Papers on International Investment*, May 2012, <http://www.oecd.org/investment/internationalinvestmentagreements/50549983.pdf>

<sup>7</sup> "CRC energy efficiency scheme," Department of Energy & Climate Change, [http://www.decc.gov.uk/en/content/cms/emissions/crc\\_efficiency/crc\\_efficiency.aspx](http://www.decc.gov.uk/en/content/cms/emissions/crc_efficiency/crc_efficiency.aspx)

reduce CO<sub>2</sub> emissions by 4 million tons by 2021, which will help the country meet its commitment to cut its carbon emissions to 50 percent of 1990 levels by 2025.<sup>8</sup>

 In 2010, the US Environmental Protection Agency (EPA) launched a Greenhouse Gas Reporting Program that requires carbon reporting from large industrial facilities that directly emit over 25,000 metric tons of CO<sub>2</sub> per year. In 2012, the program will cover 85–90 percent of total US GHG emissions.<sup>9</sup>

### Beyond public policy

At the same time that governments are mandating increased reporting policies and levying charges and limits on carbon emissions, marketplaces globally are also increasingly driving the adoption of voluntary corporate environmental policies and carbon reporting linked to their understanding of the business and financial risks associated with climate change. For example, the NASDAQ OMX Group Inc. recently joined a group of other exchanges affiliated with the Sustainable Stock Exchanges (SSE) to encourage their respective companies to begin measuring and reporting energy use, carbon emissions, and other environmental, social, and corporate governance (ESG) data and goals.<sup>10</sup>

Stock exchanges are just one example of growing interest in corporate environmental policies. The perceived value of proactive corporate environmental reporting is evident in the growth of the Carbon Disclosure Project (CDP), an independent not-for-profit organization that publishes annual reports on organizational responses to climate change. In 2012, CDP had more than 655 investor signatories (institutional investors that support CDP and have full access to company responses), representing more than US\$78 trillion in assets.<sup>11</sup> In the same year, 81 percent of corporations from the Global 500 responded to the CDP questionnaire, and the number of total responders has increased from 235 companies in 2003 to 3,715 companies in 2012. These companies are among

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<sup>8</sup> "Firms on London stock exchange will be forced to report CO<sub>2</sub> data," *Environmental Leader*, June 20, 2012, <http://www.environmentalleader.com/2012/06/20/firms-on-london-stock-exchange-will-be-forced-to-report-co2-data>

<sup>9</sup> "Greenhouse gas reporting program," United States Environmental Protection Agency, <http://www.epa.gov/ghgreporting/index.html>

<sup>10</sup> "Nasdaq joins four exchanges in sustainability effort," *Bloomberg*, June 19, 2012, <http://www.bloomberg.com/news/2012-06-19/nasdaq-joins-four-exchanges-in-sustainability-effort.html>

<sup>11</sup> "CDP investor initiatives," Carbon Disclosure Project (CDP), 2012, <https://www.cdproject.net/Documents/Brochures/CDP-Investor-Initiatives.pdf>

many that are incorporating long-term environmental policies into their own business strategies—to align with changing consumer preferences and growing stakeholder demand for corporate transparency.

## A call for greater accountability

The external cost of pollution is not internalized in the operational costs of most companies today. At Microsoft, we see climate change as a serious challenge that requires a comprehensive and global response from all sectors of society—our approach is to use corporate environmental policy to incorporate the price of carbon into financial planning at an organizational level. For example, a policy that establishes a price on the cost of greenhouse gas emissions generated from business activities provides an incentive to drive reduction efforts and manage its activities and the resources it uses more effectively. This is markedly different from an initiative-led approach—it establishes a long-term policy that ensures climate change is universally incorporated into our strategic business planning and helps to align carbon-focused initiatives across our company.

Environmental policies adopted by organizations generally have two purposes: (1) to minimize any harmful effect of organizational activities on the natural environment and (2) to ensure that any impact that an organization has on the natural environment isn't harmful to people.<sup>12</sup> Progressive organizations are also setting bolder policies that go beyond "minimizing impact" to actually help reverse harmful impacts and improve environmental conditions for future generations<sup>13</sup>. By implementing environmental policies, an organization both demonstrates environmental responsibility and establishes the core parameters that should guide the development of organizational procedures and practices.<sup>14</sup> Corporate policy also provides a framework for thinking differently about the products and services an organization offers and can be a source of innovation and open new markets.

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<sup>12</sup> John McCormick, *Environmental policy in the European Union: The European Union series* (New York, NY: Palgrave, 2001).

<sup>13</sup> Bill McDonough and Michael Braungart, *Cradle to Cradle / Remaking the Way We Make Things* North Point Press, 2002 [http://www.mcdonough.com/cradle\\_to\\_cradle.htm](http://www.mcdonough.com/cradle_to_cradle.htm)

<sup>14</sup> "Environmental policy statements," Writing@CSU, Colorado State University, 2013, <http://writing.colostate.edu/guides/guide.cfm?guideid=82>

Regulatory systems that encourage innovation and help address climate change are an essential part of the solution. Indeed, public policy can work symbiotically with corporate policy to drive real change—something we are seeing more and more of as organizations begin to take greater proactive accountability for the environmental impact of their operations. Indeed, public and corporate policy can be self-reinforcing, each in turn influencing and driving the other.

### Public-corporate partnership



We are seeing increasing interest from corporations to take greater responsibility for the environmental impact of their operations. We believe that organization-specific environmental policies will likely play an essential role in helping to achieve the desired level of accountability.

# ■ How Microsoft uses corporate policy to support environmental sustainability

At Microsoft, we take responsibility for our corporate environmental stewardship, in particular given our role in this sector. As the use of technology and its associated energy consumption and GHG emissions continue to rise, we believe it is important for us to design and implement environmental policies.

For years we have voluntarily tracked and reported on our resource use and carbon emissions. This process helps us monitor progress towards our environmental goals. Reporting externally—such as through CDP—also helps ensure that we remain accountable to our commitments. Today, we are further driving accountability for those goals and commitments by setting policies to measure, manage, and reduce GHG emissions from our operations while supporting the market for clean energy and carbon offset projects. Specifically, we have recently instituted two policies across our business:<sup>15</sup>

1. A policy to be carbon neutral effective July 2012 (the start of fiscal year 2013 for Microsoft).
2. An incentive policy in the form of an internal carbon fee to catalyze efforts across the organization and minimize our environmental impacts.

The carbon fee will play a crucial role in enabling us to achieve carbon neutrality by establishing a framework for accountability that influences our efforts to be both lean and green.

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<sup>15</sup> TJ DiCaprio, "Becoming carbon neutral: How Microsoft is becoming lean, green, and accountable," Microsoft Corporation, June 2012, [http://www.microsoft.com/environment/Carbon\\_Fee/Carbon\\_Fee.aspx](http://www.microsoft.com/environment/Carbon_Fee/Carbon_Fee.aspx)

# Carbon neutral policy

## Be lean

by reducing energy use and air travel through technology-driven efficiency

-  Reducing energy consumption in our data centers, labs, and offices
-  Reducing air travel by using Microsoft collaboration technology
-  Controlling energy use in our offices with an enterprise-wide energy management program

## Be green

by making more environmentally responsible choices with our energy, waste, and water

-  Exploring the viability of long-term renewable power purchase agreements
-  Investing capital in new renewable energy projects
-  Connecting data centers directly to innovative renewable energy sources
-  Purchasing market renewable energy certificates (RECs) and carbon offsets
-  Establishing reduction goals for waste and water

## Be accountable

by quantifying our carbon impact and holding groups responsible

-  Setting a price signal on carbon to internalize the external impact of our operations
-  Charging the teams responsible for emissions from data centers, offices, labs, and air travel
-  Driving agreement across the organization on how to achieve carbon neutrality
-  Improving transparency using emission-tracking software and Carbon Disclosure Project (CDP) reporting
-  Optimizing the supply chain
-  Engaging employees through environmental sustainability programs

## Microsoft policies to offset carbon emissions

### Carbon neutral policy

Our new carbon neutral policy is to achieve net zero emissions for our data centers, software development labs, offices, and employee air travel by investing in efficiency, clean and renewable energy, and carbon offset initiatives. Through operational governance, we are embedding accountability for this policy across the company to help drive systemic changes.

### Carbon fee policy

To help us effectively account for—and thus offset—our carbon emissions in order to achieve carbon neutrality, we have established an internal price for carbon. Our goal is to provide a new perspective on the cost of emissions. For instance, with this carbon price, the internal cost for electricity use now includes not only the price paid to the utility for electricity, but also the price paid to offset the

carbon emissions associated with electricity use. For air travel, the cost includes not only the price paid to the airline for the airplane ticket, but also the price paid to offset the carbon emissions associated with the flight.

Setting an internal carbon price alone, however, isn't sufficient to drive behavior change and achieve carbon neutrality. Therefore, starting in July 2012, Microsoft implemented an internal carbon fee policy for emissions associated with our data centers, software development labs, offices, and employee air travel. The policy is implemented through a chargeback model that is administered through our corporate finance department and applied across more than 100 countries. Embedding the cost of carbon in our financial systems gives us a direct way to measure and drive behavior change in a company-wide, systems-based way. Furthermore, by charging an internal fee for carbon emissions to the business groups responsible for incurring the emissions, we are building a central investment fund that can be used for a variety of efficiency, clean energy, and offset projects. These projects, in turn, will enable Microsoft to reduce net emissions.

The carbon fee provides a needed path to integrate environmental priorities into the business planning structure. It represents an incentive for business groups to reduce their emissions: when a potential emissions reduction project costs less than the fee for the carbon that would otherwise be emitted, it encourages responsible—and sustainable—business decisions. Finally, the carbon fee provides an example of the opportunity for organizations to internalize the external impact of carbon emissions.

### Corporate policy strategy framework<sup>16</sup>

Policy	Instrument	Target	Addressee	Regulation area
Carbon neutral	Standard	Emissions	Corporation	Global
Carbon fee	Financial	Emissions	Polluting groups	Global

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<sup>16</sup> Framework based on the following source: Patrick Balducci, "Environmental policy instruments" (lecture, Marylhurst University, Portland, OR, November 9, 2009).

## Elements of the carbon neutral and carbon fee policy<sup>17</sup>

<b>Policy instruments</b>	Carbon neutral policy Carbon fee policy
<b>Target for intervention</b>	GHG Emission reduction
<b>Regulation area</b>	Worldwide operations
<b>Cost effectiveness</b>	To meet the requirements of the carbon neutral policy, Microsoft must adopt a more efficient approach to the use of resources. By integrating the carbon fee policy into existing financial chargeback structures, it is both cost effective and efficient from an implementation and maintenance perspective.
<b>Fairness</b>	The carbon neutral and carbon fee policies span Microsoft business groups globally.
<b>Dynamic efficiency</b>	Both policies require the use of near-term lean and green initiatives and are balanced by long-term innovation investments. The carbon fee policy enables Microsoft to meet the requirements of the carbon neutral policy under changing economic conditions through flexible carbon pricing. The carbon fee policy provides an incentive for business groups using electricity and air travel to seek out greater efficiency in order to reduce their fees. This also helps Microsoft to reduce costs.
<b>Enforceability</b>	The Microsoft Environmental Sustainability team enforces the carbon neutral policy through a discipline of measurement, management, and carbon reduction initiatives. A Carbon Neutral Council drives agreement across the organization on how to achieve carbon neutrality by managing the carbon fee policy and meeting monthly to review progress and the fee price and use. The carbon fee policy is administered through the office of the CFO.
<b>Behavior considerations</b>	The carbon neutral and carbon fee policies (1) help drive behavior change by providing a framework and incentive to reduce carbon emissions; (2) provide a best case example to help other organizations reduce carbon emissions; and (3) support efficiency and the supply and demand for clean energy.
<b>Dependability</b>	These policies are supported by a foundation of long-term investments and initiatives.
<b>Flexibility</b>	The carbon neutral policy permits individual business groups to take a flexible, creative approach to reducing their carbon emissions in line with their business needs. The carbon fee policy allows for flexible carbon pricing to support a portfolio of carbon emission-reducing projects.

<sup>17</sup> Ibid.

**Internal  
acceptability**

The policies are supported by a cross-organizational governance council to help drive behavior change, reduce costs and carbon emissions, and set an example for a successful policy implementation.

## Promoting a culture of environmental sustainability

Beyond corporate policy, Microsoft is involved in a number of sustainability-related efforts that aim to lower our own footprint and help to address the daunting energy and environmental challenges facing the world today. Our people regularly work with technology partners, government agencies, nonprofits, policymakers and researchers to understand, measure, develop and deliver IT solutions that address environmental challenges. We share insights on our sustainability efforts through our Microsoft Green Blog at [blogs.msdn.com/b/microsoft-green](https://blogs.msdn.com/b/microsoft-green). A few examples of projects we are involved in include:

### Purchasing green energy

In April 2013, the U.S. Environmental Protection Agency (EPA) named Microsoft to its Green Power Partnership Top 50 List—this year our ranking increased to second on the Top 50 List. According to the EPA, Microsoft is purchasing nearly 1.9 billion kWh of green power, which is enough energy to meet 80 percent of Microsoft’s electricity use in the U.S. Our annual purchase of green power is equivalent to avoiding the carbon dioxide (CO<sub>2</sub>) emissions of nearly 285,000 passenger vehicles per year or the CO<sub>2</sub> emissions from the electricity use of more than 204,000 average American homes annually.

### Building the city of the future

Comprised of 125 buildings, 14.9 million square feet of office space and labs, and spread out across 500 acres, Microsoft’s corporate campus in Redmond, Washington is the size of a small city, which contributes to our carbon footprint. A few years ago, we started exploring ways to manage buildings smartly. It wasn’t long before we realized it could cost upward of \$60 million to replace enough equipment to seamlessly connect 30,000 sensor-enabled pieces of equipment. After searching for—and not finding—an affordable solution, the team invested in building an analytical tool to capture the disparate data. We now collect 500 million data transactions every 24 hours, and the smart buildings software presents engineers with prioritized lists of misbehaving equipment. Looking

ahead, this same solution will soon be available to any business. Learn more about our approach to Smart Buildings at [microsoft.com/en-us/news/stories/88acres](https://microsoft.com/en-us/news/stories/88acres).

### **Investing in making datacenters more efficient**

In 2012, our Global Foundation Services group, who run our network of datacenters, shared a concept for what they called a [Data Plant](#), a fuel cell-powered data center designed to run on biogas generated from landfills or water treatment plants. That concept will soon come off the drawing board in Cheyenne, Wyoming, where Microsoft is partnering with the city of Cheyenne, the University of Wyoming and Fuel Cell Energy to build the first zero carbon data center that will be completely independent of the grid and will not rely on natural gas. Located next to a water treatment plant, the 200KW data center will turn waste into data. This project is the next logical step of rethinking how we power data centers and continue to lower the impact of cloud computing on the environment.

# Closing thoughts

Microsoft has long been a leading global player in the technology sector, and we have a responsibility to address the environmental impact of the growing energy demands from our operations. Our goal with our carbon neutral and carbon fee policies is three-fold:

1. To raise internal awareness of the environmental implications of our business. By making the carbon neutral and carbon fee policies company-wide, we bring environmental considerations into business planning.
2. To establish a discipline at scale across the business, guiding the energy and travel choices made both at corporate headquarters and through local subsidiaries. The carbon fee should provide an incentive for employees in local offices to determine the best way to reduce their energy use and travel-related carbon emissions through a mix of energy efficiency and travel reduction initiatives. This, in turn, will directly support our carbon neutral policy, both by creating a central fund for clean energy and carbon offset emission projects and by providing the financial justification for investments in efficiency initiatives going forward.
3. To set an example through our own business decisions of the potential of corporate policy in mitigating and managing carbon impact. Our hope is to help organizations understand how an effective corporate environmental policy can be designed and implemented.

Our policies also set a foundation for thinking differently about our business activities and those of our customers through the products and services we offer. We have started this process by investing in studies to understand how Microsoft's products and services enable others, beyond our own organizational boundaries, to address the impact of their activities.<sup>18</sup> Microsoft is also working with leading international standards organizations, such as the World Resources Institute's Greenhouse

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<sup>18</sup> Cloud Computing and Sustainability: The Environmental Benefits of Moving to the Cloud. Accenture & WSP. November 2010. <http://www.microsoft.com/en-us/news/press/2010/nov10/11-04cloudbenefitspr.aspx>

Gas Protocol<sup>19</sup> and industry groups, such as the Green “E” Sustainability Initiative (GeSI)<sup>20</sup> to develop standard methods for assessing and measuring the environmental impacts of information and communication technologies, and in turn help us understand the full impact of our products and services from our supply chain through to our customers. These initiatives provide governments with the necessary information and tools to support public policies that encourage the adoption of new Information and Communications Technology (ICT) solutions that reduce the environmental impact of economic growth.

## Making an impact

Through internal policies and targeted initiatives at Microsoft, we are pursuing the following:

1. We have established a Carbon Neutral Council to align the company on how to best meet the carbon neutral policy commitment. Significant cross-company collaboration and brainstorming have not only increased awareness of the policy but also generated new efficiency and clean energy projects.
2. We are increasing the number of efficiency projects being implemented within the company through grants funded by the carbon fund. The projects are evaluated according to the triple bottom line of people, planet, and profit.
3. To date, Microsoft subsidiaries in nineteen countries have set reduction targets for electricity use and/or business air travel.
4. Our data centers are exploring long-term clean energy power purchase agreements.
5. Our facilities team is implementing an energy management solution globally to help reduce waste in electricity consumption.

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<sup>19</sup> <http://www.ghgprotocol.org/feature/ghg-protocol-product-life-cycle-accounting-and-reporting-standard-ict-sector-guidance>

<sup>20</sup> <http://www.microsoft.eu/innovation-in-society/posts/new-gesi-study-the-role-of-ict-in-reducing-the-global-carbon-footprint.aspx>

6. We are expanding our portfolio of investments in clean energy sources and carbon offset initiatives.
7. Several corporations, not-for-profit organizations and academic institutions are now considering carbon neutral and carbon fee policies; by setting an example of what is possible, our policies will hopefully ultimately inspire other organizations to take similar measures and help reduce global emissions.

## About the author

Tamara ("TJ") DiCaprio is responsible for reducing the global carbon footprint at Microsoft. TJ joined the Microsoft Environmental Sustainability group in 2010 and since that time has worked closely with the team to help develop an internal carbon footprint strategy, establish an internal governance model, and shape internal corporate carbon reduction policy direction. She was the chief architect behind the development and implementation of Microsoft's carbon neutral and carbon fee policies. Recently, TJ was recognized by the U.S. Congress and received the EPA Individual Climate Leadership Award for her work in establishing bold mitigation efforts to climate change at Microsoft.



TJ is passionate about finding novel ways to drive accountability for environmental sustainability. She works closely with both government and non-governmental organizations such as the Environmental Protection Agency (EPA), Association of Climate Change Officers (ACCO), World Wildlife Fund (WWF), Environmental Defense Fund (EDF), World Resources Institute (WRI), Gates Foundation, World Bank, United Nations Framework Convention on Climate Change (UNFCCC), and Carbon Disclosure Project (CDP) to gain input and solicit feedback on her work as well as share best practices.

TJ is on the board of directors for the Association of Climate Change Officers (ACCO) to help promote the development of the profession.

To provide feedback or comments on this paper or share your own experiences with corporate carbon policies, please contact TJ at [tjdicap@microsoft.com](mailto:tjdicap@microsoft.com) and follow her on Twitter [@TJDiCaprio](https://twitter.com/TJDiCaprio).