

# Environmental Management System

## Carbon Reduction Plan



<b>Plan Owner:</b>	Matthew Christian	<b>Job Title:</b>	HSE&Q Manager
<b>Publication Date:</b>	April 2025 – V6	<b>Commitment to achieving Net Zero</b>	Sudlows are committed to achieving Net Zero emissions by 2035
<b>Operating Company:</b>	Sudlows		

### Section 1: Sustainability Commitment

Sudlows Limited are committed to the protection and enhancement of the environment whilst reducing our overall carbon footprint to 'net zero'. Our goal is to minimise the negative impacts of our operations and maximise the quality of the built environment for future generations. Through innovation and application of good practice, we aim to steer the industry to design sustainable and high-quality built Data Centres with as little environmental impact as possible through their whole asset life cycle.

#### Our goal will be realised by:

- Continual improvement of the environmental performance of our activities, products and services through clear objectives, targets.
- Complying with relevant legislation and requirements and regularly evaluating this compliance.
- Proactively minimising environmental impacts, including being industry leading in minimising direct and embodied carbon emissions, and providing energy efficient/low carbon assets for our clients.
- Improving resource efficiency by reducing the use of natural resources, reducing waste and diverting the waste we do produce away from landfill sites.
- Reducing our water consumption and improving water efficiency.
- Minimising polluting emissions or discharges to the environment.
- Proactively protecting, preserving and enhancing wildlife/flora and their natural habitats.
- Enhancing employee understanding of environmental sustainability, through stimulating cultural change and providing clear direction.
- Integrating climate considerations into designing and delivering work projects and our day-to-day business activities
- Engaging our supply chain in improving their environmental performance and responsible sourcing.
- Maintaining registration to ISO 14001:2015 for the business.
- Strong governance of the environmental agenda underpinned by monitoring and reporting of progress against environmental targets and objectives.

#### Baseline Emissions Footprint

Sudlows are committed to achieving 'net zero' emissions by 2035. In order to produce meaningful data to track our progress towards this target, a review of our operations was completed during 2021 to establish our baseline emissions information. Baseline emissions are a record of the greenhouse gases that have been produced in the past and were produced prior to the introduction of our strategies to reduce our emissions. The Sudlows baseline emissions information listed within this carbon reduction plan provides an overview of our targets, objectives and progress towards our mission of reaching net zero emissions by 2035.

#### Baseline Year

Year:	2021	Details relating to the Baseline Emissions calculations.	The Covid pandemic and company restructuring during 2020/21 resulted in issues establishing any meaningful or accurate baseline calculations. The baseline emission calculations that are now in place relate to or operations during 2021/22 and covers Scope 1 and Scope 2. Systems are still being developed to capture meaningful data on our supply chain to establish a Scope 3 baseline.
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### Section 2: Scope 1 and Scope 2 Information

#### Company Facilities

#### Carbon Footprint Overview for the Chadderton Office.

	2021 -Baseline			2022- Year 1			2023- Year 2		
	kWh	Total kWh	kgCO <sub>2</sub> e	kWh	Total kWh	kgCO <sub>2</sub> e	kWh	Total kWh	kgCO <sub>2</sub> e
Gas	121378	262633	259448	120272	251142	254746	89373	211986	195817
Electricity	141255	kWh	kgCO <sub>2</sub> e	130870	kWh	kgCO <sub>2</sub> e	122613	kWh	kgCO <sub>2</sub> e
	Baseline Reading			2% reduction from 2021			26% reduction from 2022		

	2024 -Year 3		
	kWh	Total kWh	kgCO2e
Gas	74208	kWh	166076
Electricity	115383		kgCO <sub>2</sub> e
	15% reduction from 2023		

\* Gas smart meter showing incorrect readings for 2024- Usage calculated based on 6 months correct readings.

#### Carbon Footprint Overview for the Ducie Works Office.

	2021 -Baseline			2022- Year 1			2023- Year 2		
	kWh	Total kWh	kgCO <sub>2</sub> e	kWh	Total kWh	kgCO <sub>2</sub> e	kWh	Total kWh	kgCO <sub>2</sub> e
Electricity	Invoice	110435 kWh	28376 kgCO <sub>2</sub> e	Invoice	106188 kWh	27284 kgCO <sub>2</sub> e	Invoice	100178 kWh	25740 kgCO <sub>2</sub> e
	Baseline Reading			4% reduction from 2021			6% reduction from 2022		

	2024 -Year 3		
	kWh	Total kWh	kgCO2e
Gas	NA	kWh	22811
Electricity	88786		kgCO <sub>2</sub> e
	11% reduction from 2023		

#### Carbon Footprint Overview for the Watford Office

	2021 -Baseline			2022- Year 2			2023- Year 2		
	kWh	Total kWh	kgCO <sub>2</sub> e	kWh	Total kWh	kgCO <sub>2</sub> e	kWh	Total kWh	kgCO <sub>2</sub> e
Electricity	Invoice	99485 kWh	25562 kgCO <sub>2</sub> e	Invoice	98987 kWh	25434 kgCO <sub>2</sub> e	Invoice	97883 kWh	25150 kgCO <sub>2</sub> e
	Baseline Reading			1% reduction from 2021			1% reduction from 2022		

	2024 -Year 3		
	kWh	Total kWh	kgCO2e
Gas	36482	71008 kWh	18243
Electricity	34526		kgCO <sub>2</sub> e
	31% reduction from 2023		

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Transport			
Carbon Footprint Overview for the Fleet Department			
	2021 -Baseline	2022	2023
	kgCO2e	kgCO2e	kgCO2e
Transport	No Baseline data available due to COVID restrictions	619102 kgCO2e	519899 CO2e
		Data from Allstar Fuel Usage Analysis	17% reduction from 2022

	2024 -Year 3
	kgCO2e
Transport	430996 kgCO2e
	19% reduction from 2023

### Section 3: Scope 3 Information

#### Supply Chain Management – Carbon Reduction Programme.

Due to the size and complexity of our supply chain establishing meaningful baseline information for Scope 3 has proved difficult. At the start of December 2022, Sudlows expanded our procurement department to include a fulltime development co-ordinator. Since the introduction of our supplier development function a great deal of work has been carried out working with our small to medium contracting organisations in order to establish and issue our 'Contractor Code of Conduct' that includes our sustainability policy:

#### Sustainability Code of Conduct for Approved Contractors

At Sudlows we are aware that we can achieve sustainable growth only when we engage with all our stakeholders. It is our mission to create an identity where sustainability, responsibility and accountability are fully integrated into our ways of working. Our approved contractors are amongst our main stakeholders and we want them to integrate criteria in their purchase, sale and outsourcing procedures that reflect social, ethical and environmental concerns. Suppliers have to comply with the principles outlined in this Sustainability Code of Conduct for Suppliers, which is a component of our overall Corporate Sustainability and Responsibility strategy. Contractors must conduct their activities with due respect for the environment and take initiatives to reduce their ecological footprint.

Whilst our larger Suppliers and specialist contractors are well on their way to their own targets of net zero emissions, the smaller contracting organisations that make up a significant part of our supply chain require a level of mentoring on target setting and data collection to enable them to provide us with meaningful emissions information. During 2025 the Sudlows procurement team are working to develop identified approved specialist contractors to begin capturing more meaningful Scope 3 data.

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### Section 3: Carbon Reduction Gains, Target and Project Information

Baseline Year Emissions		Year 1		Year 2	
EMISSIONS	2021	EMISSIONS	2022	EMISSIONS	2023
	TOTAL (tCO <sub>2</sub> e)		TOTAL (tCO <sub>2</sub> e)		TOTAL (tCO <sub>2</sub> e)
Scope 1	No Scope 1 data due to Covid restrictions	Scope 1	619102 kgCO <sub>2</sub> e	Scope 1	519899 kgCO <sub>2</sub> e
Scope 2	313386 kgCO <sub>2</sub> e	Scope 2	307464 kgCO <sub>2</sub> e	Scope 2	246707 kgCO <sub>2</sub> e
Scope 3	No Current Baseline	Scope 3	SDC Introduced	Scope 3	Supply Chain Development underway
Total	313386 kgCO <sub>2</sub> e	Total	926566 kgCO <sub>2</sub> e	Total	766606 kgCO <sub>2</sub> e

Year 3	
EMISSIONS	2024
	TOTAL (tCO <sub>2</sub> e)
Scope 1	430996 kgCO <sub>2</sub> e
Scope 2	207130 kgCO <sub>2</sub> e
Scope 3	No Current Baseline
Total	638126 kgCO <sub>2</sub> e

### Emissions Reduction Targets

Based on the company's initial 2021 baseline calculations and year 1 accurate calculations comparing like for like with 2024, the company initiatives have produced a net saving of 288440 kgCO<sub>2</sub>e. That is a total reduction of 38%, over 10% per year on currently measurable emissions.

In order for Sudlows to continue with the progress made so far to achieving our 2035 Net Zero target we have adopted the following carbon reduction targets:

- Continue, year on year to identify measurable sources of carbon emissions.
- Target an annual reduction of 10% of all identified carbon emissions.
- Achieve a measurable 50% reduction in our carbon emissions in the first five years: 2027

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### Carbon Reduction Projects

#### Completed Carbon Reduction Initiatives

The following environmental management measures and projects have been completed or implemented since the 2021 baseline.

- Introduction of a new fleet management system to improve vehicle tracking and improve fuel economy.
- Improvement in work allocation to reduce overall vehicle mileage.
- Exchanging out older vehicles to develop a more fuel-efficient fleet.
- Installation of electrical vehicle charging points at Sudlows premises (12 EV charging stations currently installed).
- Introducing electrical vehicles into the fleet.

The carbon emission reduction achieved by these schemes equate to 288440kgCO<sub>2</sub>e reduction against the 2021 baseline measurement.

In addition the following aims to further reduce our carbon emissions:

- Introduction of a new Supplier Development Co-ordinator to drive sustainability into the supply chain (Scope 3)
- Improved Supplier code of Conduct introduced. (Scope 3)
- Improving the efficiency of company premises heating, ventilation, A/C and lighting systems.
- Planned installation of solar panels at our Chadderton Office site.
- Planned scope 3 emission recording for company waste streams
- Introduction of the Simpler Recycling Legislation requirements across all company premises and active construction projects which will increase recycling efficiency, reduce production emissions, decrease waste sent to landfills, reduce transportation emissions & overall GHGs.

### Water Management Plan – 2024

#### Water Reduction

A programme of regular site inspections was introduced during 2023 across all company owned facilities to conduct ongoing check for visual signs of water systems leakage. It is company policy to carry out immediate maintenance work to fix water leaks when identified through both pro-active and reactive monitoring.

#### Water Management

The approach adopted by Sudlows to improving the management of water is to encourage and empower our staff to take greater responsibility for water consumption around our office sites and construction sites. The company has reviewed all water system fixtures and fittings and where old or damaged items have been identified they have been replaced with items to improve efficiency.

#### Availability of Drinking Water

In line with our target to eliminate all but essential single-use plastics, Sudlows have established drinking fountains in all our offices and construction sites where staff and visitors are encouraged to refill bottles with drinking water.

#### Target Zero

The Sudlows TZ programme will be working closely with our construction teams during 2024 to raise awareness of good water management and to reduce water leakage associated with temporary water systems.

Over recent years, company restructuring has made it difficult to establish accurate meaningful baseline on water consumption. During 2024 the HSE&Q Team are working towards establishing baseline measurements by which targeted reductions will be measured against.

Once established an absolute water consumption reduction target will be established of 5% for 2025.

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Declaration and Sign Off
<p>This Carbon Reduction Plan has been completed using currently available information collected by Sudlows HSE&amp;Q Team. This document is a live document and is subject to ongoing controlled issue revisions.</p> <p>Matthew Christian</p> <p>Date: V6 -April 2025</p>