

Environmental Management System

Carbon Reduction Plan



Plan Owner:	Sandra Green	Job Title:	Head of HSE
Publication Date:	September 2026 - V9	Commitment to achieving Net Zero:	Sudlows are committed to achieving Net Zero emissions by 2050
Section 1: Sustainability Commitment			

Sudlows are committed to the protection and enhancement of the environment whilst reducing our overall carbon footprint to Net Zero. Our goal is to minimize the negative impacts of our operations and maximize 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 realized by:

- Continual improvement of the environmental performance of our activities, products and services through clear objectives and targets.
- Complying with relevant legislation and requirements and regularly evaluating this compliance.
- Proactively minimizing environmental impacts, including direct and embodied carbon emissions.
- Improving resource efficiency, reducing waste and diverting waste from landfill.
- Integrating climate considerations into designing and delivering work projects and day-to-day business activities.
- Engaging our supply chain in improving environmental performance and responsible sourcing.
- Maintaining registration to ISO 14001:2015 and monitoring progress against environmental targets.

PPN 006 Commitment to Net Zero

Sudlows confirms its organizational commitment to achieving Net Zero greenhouse gas emissions by 2050 at the latest.

This Carbon Reduction Plan has been prepared as a summary document for the bidding supplier in accordance with Procurement Policy Note PPN 006 and the associated Technical Standard for Completion of Carbon Reduction Plans.

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Section 2: Organisational Boundary, Methodology and Reporting Period

Reporting boundary: United Kingdom operations of Sudlows that fall within the selected operational control boundary.

Consolidation approach: Operational control. Sudlows reports emissions from operations over which it has authority to introduce and implement operating policies.

Reporting period: Calendar year 2025. The same reporting period is used for the current emissions footprint throughout this Carbon Reduction Plan.

Baseline period: 2021/22. Due to the COVID pandemic and company restructuring, complete Scope 1 information was not available for 2021. Scope 1 therefore uses 2022 as the first complete comparable year, while available 2021 Scope 2 data is retained for historical trend purposes.

Calculation methodology: Emissions are reported in tonnes of carbon dioxide equivalent (tCO₂e). Calculations are to be completed in accordance with the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard, using the applicable UK Government greenhouse gas conversion factors for the relevant reporting year.

Greenhouse gases: The footprint is intended to account for the seven greenhouse gases required by the PPN 006 Technical Standard where relevant to Sudlows' activities, expressed as CO₂e.

Baseline Emissions Footprint - PPN 006 Summary

Emission source	Baseline period	Emissions (tCO ₂ e)
Scope 1	2022	619.102
Scope 2	2022	104.456
Scope 3	2025	226.140
Total established baseline emissions	2021/22 +2025	949.698
Note	Baseline timelines are varied due to under reporting of environmental performance.	

Current Emissions Footprint - 2025

Emission source	2025 emissions (tCO ₂ e)
Scope 1	381.184
Scope 2	89.606
Scope 3 - required five categories	226.140
Total emissions	696.930

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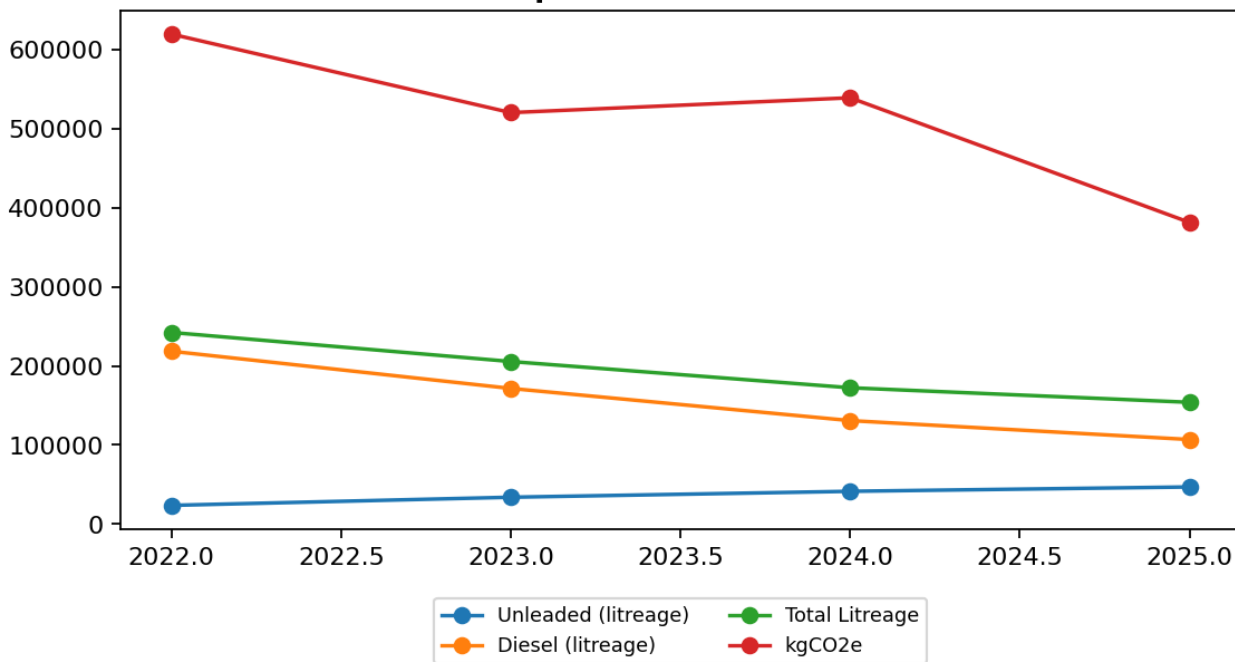
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Section 3: Scope 1 Emissions - Fleet / Fuel Usage

Year	2022	2023	2024	2025
Unleaded (litres)	23,736	34,010	41,493	46,995
Diesel (litres)	218,444	171,454	130,814	106,923
Total litres	242,180	205,464	172,307	153,918
kgCO ₂ e	619,102	519,900	538,643	381,184
Change	Baseline	17% reduction	4% increase	34% reduction

Scope 1 Emissions - Fuel



The 2025 Scope 1 total is 381.184 tCO₂e. Sudlows will retain source records and calculation workings supporting the reported footprint.

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Section 4: Scope 2 Emissions - Office Energy

Chadderton Office

Year	2021	2022	2023	2024	2025
Gas (kWh)	121,378	120,272	89,373	74,208	88,698
Electricity (kWh)	141,255	130,870	122,613	115,383	141,852
Total kWh	262,633	251,152	211,986	189,591	230,550
kgCO ₂ e	58,610	55,738	47,936	43,287	52,752

Ducie Works Office

Year	2021	2022	2023	2024	2025
Gas	N/A	N/A	N/A	N/A	N/A
Electricity	Invoice	Invoice	Invoice	88,786	78,658
Total kWh	110,435	106,188	100,178	88,786	78,658
kgCO ₂ e	28,376	27,284	25,740	22,813	20,209

Watford Office

Year	2021	2022	2023	2024	2025
Gas	N/A	N/A	N/A	36,482	36,419
Electricity	Invoice	Invoice	Invoice	34,526	38,725
Total kWh	99,485	98,987	97,883	71,008	75,144
kgCO ₂ e	25,562	25,434	25,150	18,243	16,645

2025 Scope 2 total: 89,606 kgCO₂e (89.606 tCO₂e). Electricity consumption at Chadderton increased during the period following installation and operation of EV charging infrastructure, while recorded fleet fuel consumption reduced.

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Section 5: Carbon Reduction Totals - Scope 1 and Scope 2

Year	2022	2023	2024	2025
Scope 1 kgCO ₂ e	619,102	519,900	538,643	381,184
Scope 2 kgCO ₂ e	104,456	95,899	84,243	89,606
Total tCO ₂ e	723.55	615.79	622.88	470.79
Total kgCO ₂ e	723,558	615,799	622,886	470,790
Change	First full year	16% reduction	14% reduction	43% reduction
Emissions Reduction Targets				

Based on the company's initial baseline calculations and the first accurate like-for-like calculations compared with 2025, current initiatives have produced a reduction of 252,768 kgCO₂e / approximately 253 tCO₂e across currently measured Scope 1 and Scope 2 emissions.

- Continue year-on-year identification of measurable sources of carbon emissions.
- Target an annual reduction of 10% of all identified carbon emissions.
- Achieve a measurable 50% reduction in carbon emissions in the first five years, by 2027.
- Progressively improve completeness and accuracy of the five PPN 006 Scope 3 categories.

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Section 6: Scope 3 Emissions - PPN 006 Required Categories			
PPN 006 Scope 3 category	Baseline tCO ₂ e	2025 tCO ₂ e	Status / basis
4. Upstream transportation & distribution	N/A	N/A	Data not currently available / methodology being established
5. Waste generated in operations	.04587686 (2024)	.0548306	Waste broker data – calculated from recorded waste volumes
6. Business travel	226.085 (2025)	226.085	Information is collected from transport tracker.
7. Employee commuting	Currently being collated and quantified	Currently being collated and quantified	Currently being collated and quantified
9. Downstream transportation & distribution	N/A	N/A	Not applicable – no applicable downstream transportation and distribution emissions identified within the reporting boundary.
TOTAL REQUIRED SCOPE 3	226.130	226.140	Incomplete data set as per status.
Scope 3 Data Availability and Methodology			

The organisation is currently developing and formalising its Scope 3 emissions data collection processes. Historically, the organisation has not collected all activity data required to quantify each of the five Scope 3 categories specified within PPN 006.

Where reliable data is available, this has been used within the Carbon Reduction Plan. Where complete data is not currently available, this has been identified transparently rather than estimated without an appropriate evidential basis.

Category 4 – Upstream Transportation and Distribution: Data collection methodology is currently being established with key suppliers and logistics providers.

Category 5 – Waste Generated in Operations: Waste information is centrally managed through the organisation's waste broker, which captures approximately 99% of operational waste. This information is being used to establish the associated Scope 3 emissions.

Category 6 – Business travel emissions have been calculated using the organisations centrally maintained 2025 Travel Tracker, which records employee business travel including air and rail journeys undertaken during the reporting period.

Journey information recorded within the tracker, including travel type, origin and destination, journey type and passenger information where available, has been used to determine the associated travel activity.

Greenhouse gas emissions have been calculated using the applicable UK Government 2025 Greenhouse Gas Conversion Factors for Company Reporting. Air travel has been categorised according to journey type and distance, with appropriate passenger-kilometre conversion factors applied. Rail journeys have similarly been calculated using the relevant passenger rail conversion factors.

Where information within the travel records was insufficient to reliably quantify an individual journey, the data has been excluded or treated using documented assumptions to avoid overstating or double-counting emissions.

The resulting emissions are reported in tonnes of carbon dioxide equivalent (tCO₂e) and represent the organisation's quantified Scope 3 Category 6 Business Travel emissions for the 2025 reporting period.

Category 7 – Employee commuting data for the 2025 reporting period is available through the organisation's mileage and travel records. At the date of publication of this Carbon Reduction Plan, this information is being collated and reviewed to distinguish qualifying employee commuting journeys from fleet and business travel and to prevent double counting with Scope 1 and Scope 3 Category 6 emissions.

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Following completion of this review, qualifying commuting mileage will be converted to tonnes of carbon dioxide equivalent (tCO₂e) using the applicable UK Government Greenhouse Gas Conversion Factors. The resulting figure will be incorporated into the organisation's emissions inventory as part of the ongoing improvement of Scope 3 reporting.

Category 9 – Downstream Transportation and Distribution: The applicability of this category has been reviewed against the organisation's operational activities. Where no applicable downstream transportation occurs, this will be recorded accordingly.

The organisation will continue to improve the completeness and accuracy of its Scope 3 inventory as data collection arrangements mature.

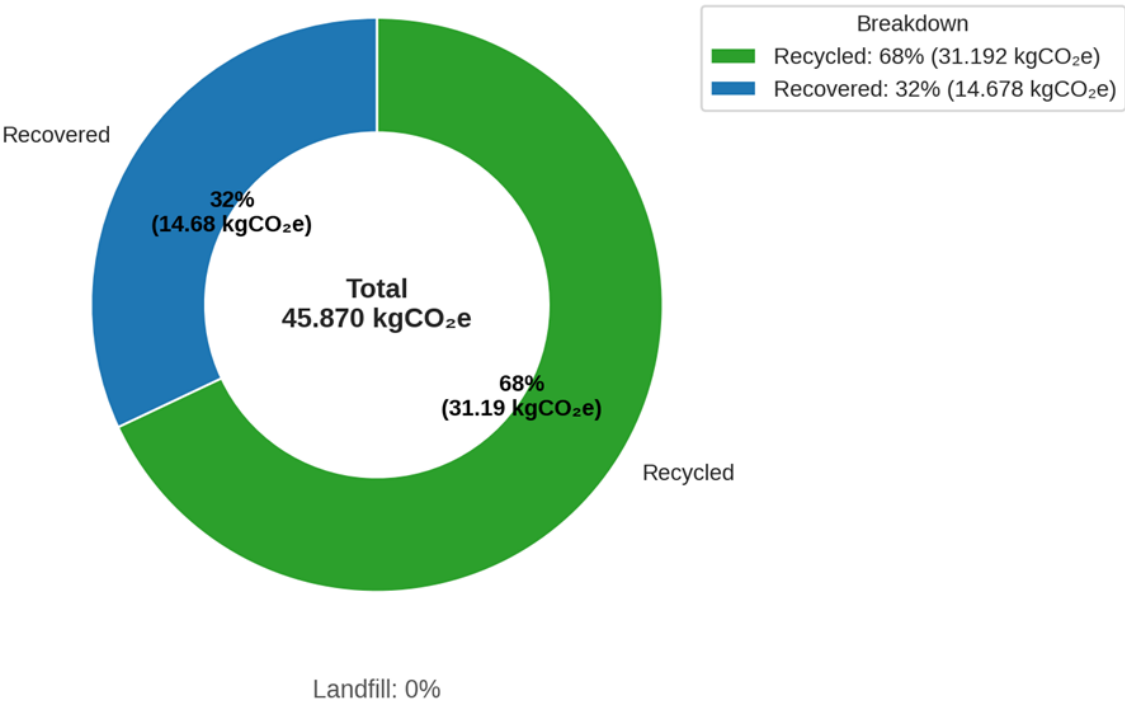
Scope 3 Waste - Existing Sudlows Data

During 2024 and 2025, Sudlows implemented a structured process to collect, verify and report Scope 3 emissions associated with waste generated across sites and operational activities, including waste volumes by type, disposal routes and treatment methods.

Scope 3: Waste Reporting - 2024

Year	2024
Sudlows controlled construction sites	43,97 kgCO ₂ e
No. construction sites	23
Sudlows offices (Ducie & Chadderton)	1,906 kgCO ₂ e
Total	45,876 kgCO ₂ e

Waste Treatment Mix – Carbon Reduction Plan



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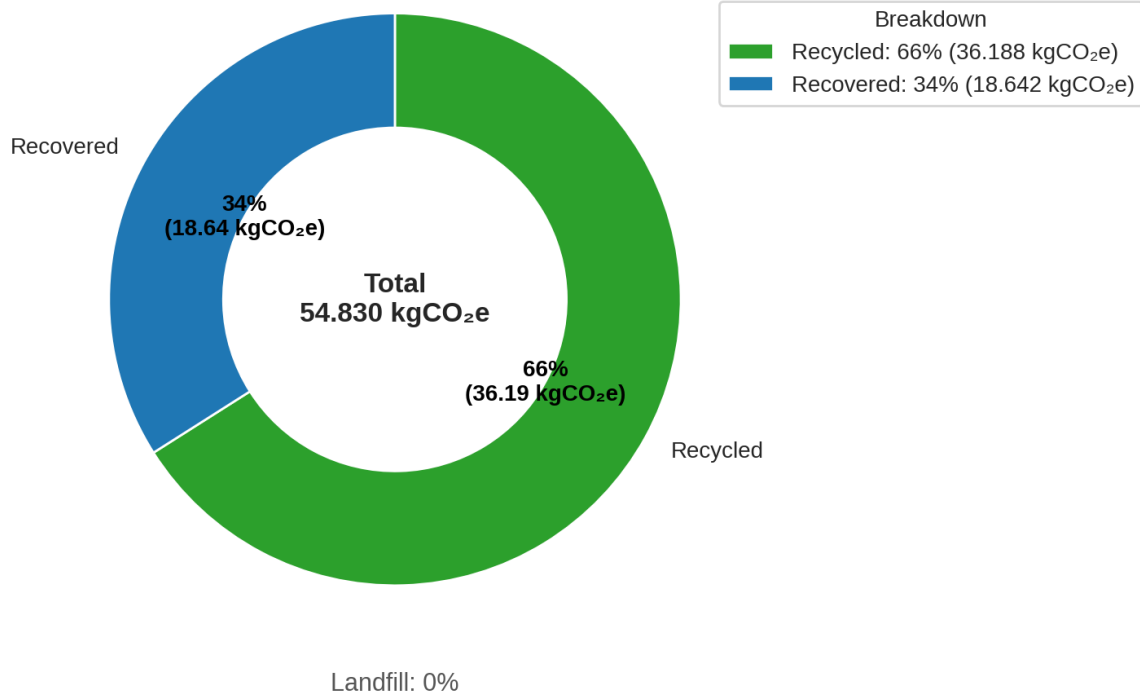
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Scope 3: Waste Reporting - 2025

Year	2025
Sudlows controlled construction sites	53,192 kgCO ₂ e
No. construction sites	25
Sudlows offices (Ducie & Chadderton)	1,6386 kgCO ₂ e
Total	54,8306 kgCO ₂ e

Waste Treatment Mix – Carbon Reduction Plan



The total waste-related emissions increased in 2025 compared with 2024, primarily alongside an increase from 23 to 25 active construction sites. The existing CRP states that waste handling remained focused on recycling, recovery and landfill avoidance.

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Section 7: Carbon Reduction Projects

Completed Carbon Reduction Initiatives

The following environmental management measures and projects have been completed or implemented since the 2021/22 baseline:

- Introduction of a new fleet management system to improve vehicle tracking and fuel economy.
- Improvement in work allocation to reduce overall vehicle mileage.
- Replacement of older vehicles to develop a more fuel-efficient fleet.
- Installation of electric vehicle charging points at Sudlows premises.
- Introduction of electric vehicles into the fleet.

The source plan attributes a reduction of 252,768 kgCO₂e in Scope 1 and Scope 2 emissions to the combined programme of measures when comparing the baseline/first complete reporting position with 2025.

Further measures:

- Improve efficiency of company premises heating, ventilation, air-conditioning and lighting systems.
- Planned installation of solar panels at the Chadderton office.
- Strengthen Scope 3 data capture and reduction actions across all five PPN 006 categories.
- Strengthen supply chain engagement.
- Improve energy efficiency on construction sites.

Application to Contract Performance

Where relevant to the contract being procured, Sudlows will apply the environmental management measures and carbon reduction initiatives described in this Carbon Reduction Plan during contract performance, including fleet efficiency, energy efficiency, waste reduction, supply-chain engagement and improved carbon data collection.

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Section 8: Water Usage & Management Plan - 2026

Sudlows is committed to reducing the environmental impact associated with operational water use. Although water consumption is a relatively low contributor to overall emissions, responsible management supports wider sustainability goals.

- Minimise potable water use across projects and offices by encouraging efficient practices and reducing unnecessary consumption.
- Improve monitoring and data accuracy through increased use of metering and contractor-reported water usage.
- Adopt water-efficient methods during installation, testing and commissioning works wherever feasible.
- Reduce wastewater generation and manage wastewater responsibly.
- Promote staff and subcontractor awareness.
- Support clients in low-water project delivery and identify efficiency opportunities.

During 2026 the H&S Team is working towards establishing baseline measurements against which targeted reductions will be measured. Once established, an absolute water consumption reduction target of 5% is intended for 2026/27.

This section supports Sudlows' wider environmental management programme; it is supplementary to the greenhouse gas reporting requirements of PPN 006.

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Section 9: Declaration and Sign-Off

This Carbon Reduction Plan has been completed in accordance with PPN 006 and the associated Technical Standard for Completion of Carbon Reduction Plans.

Emissions have been recorded and reported in accordance with the published reporting standard for Carbon Reduction Plans and, where applicable, the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. Emissions are expressed as tonnes of carbon dioxide equivalent (tCO₂e), using appropriate UK Government greenhouse gas conversion factors for the relevant reporting year.

Scope 1 and Scope 2 emissions have been reported, together with the required subset of Scope 3 emissions comprising upstream transportation and distribution, waste generated in operations, business travel, employee commuting, and downstream transportation and distribution.

Sudlows confirms its commitment to achieving Net Zero emissions by 2050 at the latest.

Board / Equivalent Management Body Approval

Approval statement	This Carbon Reduction Plan was approved by the Board of Directors / equivalent management body of Sudlows.
Date of approval	08/09/2026
Meeting / approval reference (optional)	N/A

Director / Equivalent Sign-Off

Signed off by	Sandra Green
Job title	Head of HSE
Date	08/09/2026
Signature	