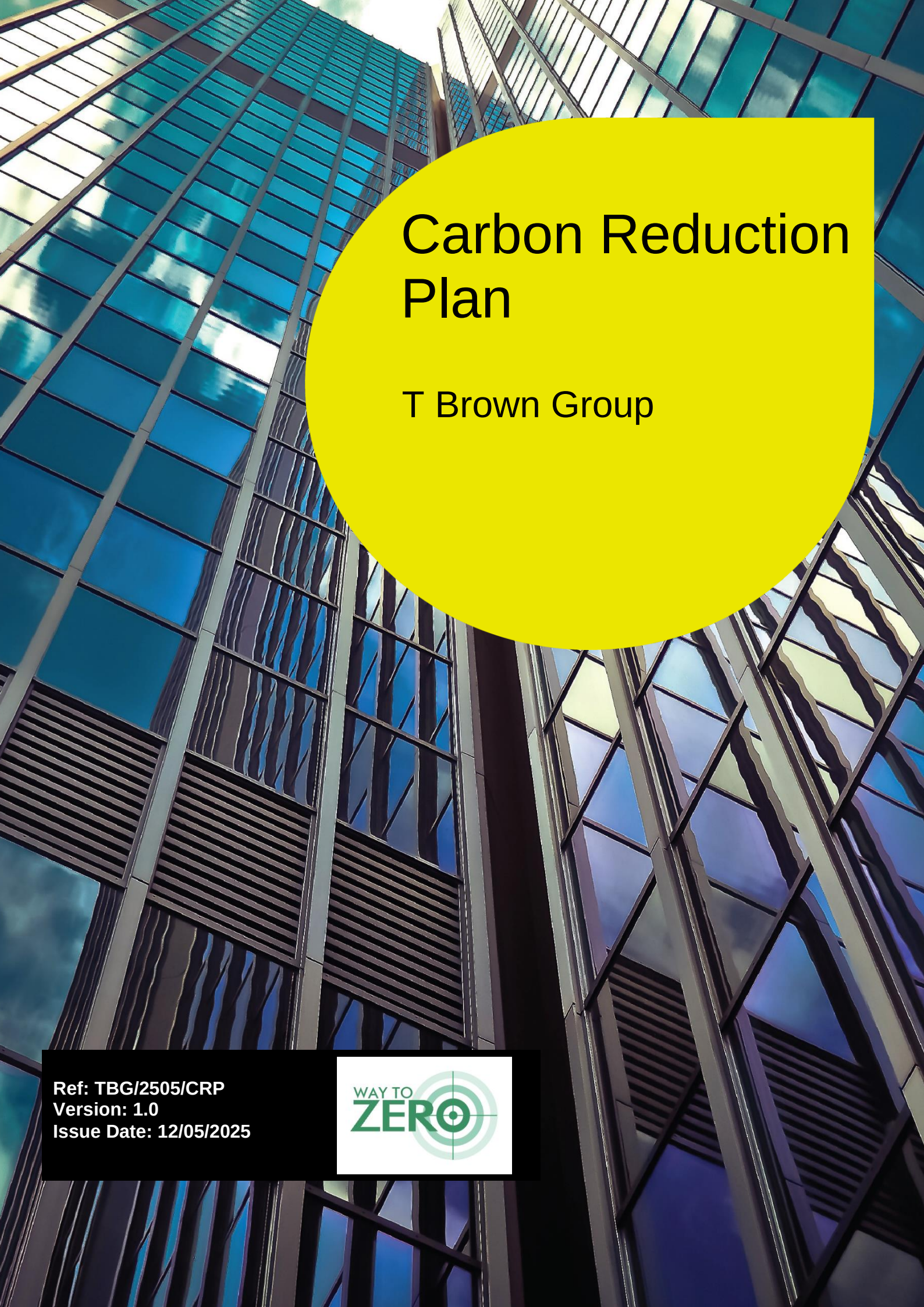

Carbon Reduction Plan

T Brown Group

Ref: TBG/2505/CRP
Version: 1.0
Issue Date: 12/05/2025

CONTENTS

Page

1 INTRODUCTION 1
1.1 Background 1
1.2 Scope 1
1.3 SMART Reductions 2
2 SHORT TERM PLANNING & REDUCTIONS 3
2.1 Scope #1 and #2 Emissions 3
2.2 Scope #3 4
2.3 Verified Carbon Reduction Standards 5
3 MEDIUM TERM PLANNING & REDUCTIONS 7
3.1 Scope #1 and #2 Emissions 7
3.2 Scope #3 7
3.3 Verified Carbon Reduction Standards 8
4 LONG TERM PLANNING & REDUCTIONS 9
4.1 Scope #1 and #2 Emissions 9
4.2 Scope #3 9
4.3 Verified Carbon Reduction Standards 10
5 SUMMARY 11
5.1 Short Term 11
5.2 Medium Term 11
5.3 Long Term 13

1 Introduction

1.1 Background

This Carbon Reduction Plan (CRP) has been developed to meet the requirements of Procurement Policy Note PPN06/21; “Taking Account of Carbon Reduction Plans in the procurement of major government contracts”, published in June 2021.

The T Brown Group (TBG) financial year runs between 1st May and 30th April each year, and carbon reduction achievement, status and planning documents will be issued within three months of the year end commencing in 2026.

TBG has committed itself to align its goals to major net zero standards, for the company to be net zero by 2050. This document plans for TBG to be net zero by 2045, five years ahead of the deadline. The immediate challenge is for accurate and regular data collection, and the work to meet this challenge will be complete by the end of FY 2026-27

The commitments of this carbon reduction plan, are split into three timeframes.

- **Short** : Meaning activities that will be **completed** before 30th April 2027
- **Medium** : Meaning activities that will be completed before 30th April 2031
- **Long** : Meaning activities that will be started during the current financial year but will be completed before 2045, and will be regularly updated and realigned to the current situation.

1.2 Scope

The scope of this carbon reduction plan includes 100% of scope #1 and scope #2 emissions where TBG are provided with measured consumption either by a supplier of the energy/fuel or via a landlord’s supply. Unmeasured or unquantified suppliers are excluded, from this CRP, however steps will be taken to include such consumption in future plans.

There are 15 categories of scope #3 emissions, and of all these categories it is believed that only 5 categories are applicable to TBG.

- (1) Purchased goods and services
- (2) Capital goods
- (5) Waste generation
- (6) Business travel
- (7) Employee commuting

For the purposes of this CRP, only category #1 ‘Purchased goods and services’, are within the scope. Categories #5, #6, and #7 are currently not sufficiently measured by TBG, and one of the short term objectives of this CRP is to reliably and consistently measure these categories.

Category #2 is also out of scope of this document, and category #2 is exceptionally difficult to measure accurately. Measurements for category #2 are a medium term objective, and will be included when appropriately measured.

1.3 SMART Reductions

All reductions will be Specific, Measurable, Achievable, Relevant and Time-Bound. This carbon reduction plan does not include and SMART reductions, as TBG is at the start of the journey to Net Zero, and has to devise many of the carbon accounting practices to manage the reduction of carbon.

Therefore in the short term (by 30th April 2027) quantification of SMART reductions will be defined, and from there forward specific measures for the reduction of carbon will be included with subsequent carbon reduction plans

2 Short Term Planning & Reductions

To 30th April 2027

2.1 Scope #1 and #2 Emissions

2.1.1 Buildings

Currently electricity and gas supplies are from an unknown origin. Where TBC has a direct relationship with a supplier the supplies are not specifically from renewable sources. Where the relationship is through the landlord, the landlord does not disclose the source of the energy.

Carbon reductions in both types of energy can be achieved by simply switching to using 100% renewable supplies. Where the relationship is directly with the energy supplier this will be done at the time of contract renewal, and by negotiation with landlords.

Any renewable supply of energy will be backed by Energy Attribute Certification (EAC) such as REGOs or similar.

2.1.2 Fleet

2.1.2.1 Operational Vehicles

In the short term TBG aim to replace as many carbon-based fuelled vehicles with alternatives but will not be able to make wholesale changes, due to many factors, operational considerations, range, and ability to charge/refuel alternative vehicles. Moving to less carbon intensive modes of operational transport will be utilised where fully electric is not suitable.

Short term TBG will resolve to reduce carbon emissions through the introduction of new technologies within telematics management, and to enhance behaviour change within the vehicle drivers to minimise fuel consumption. The new telematics system will be operational in 2025, and this will lead to an expected reduction in consumption and carbon emissions of between 5% and 15% or more.

Where larger ‘transit’ style vans are no longer required these will be replaced with smaller ‘caddy’ style vehicles, which have a much greater fuel efficiency.

2.1.2.2 Executive and Staff Vehicles

The current fleet of cars are a mixture of carbon fuelled vehicles and electric vehicles. In the short term all of these vehicles will become electric vehicles as the current lease term ends.

Staff will be encouraged to charge the vehicles (wherever this is reasonably possible) using renewable electricity backed with EACs.

2.2 Scope #3

2.2.1 Category #1 – Purchased Goods and Services

Currently the carbon emissions from purchased goods and services are measured by converting the spend on these goods and services into emissions using government conversion tables. Spending less on goods and services, operationally is not possible.

Just two of the companies account for 35% of all scope #3 category #1 emissions by spend. It is vital that the carbon attributable to these companies is accurate and measured directly from their emissions rather than by spend. This work will be undertaken in the short term. Following the establishment of a true set of carbon emissions TBC will work with these companies to jointly reduce overall carbon emissions.

In the medium term this process will be repeated with all other suppliers.

Also within the period to 30th April 2027, the TBG procurement service will define methods of appropriately including and weighting decisions in regard to carbon within supplier selection (including subsequent contracts) and in renewing existing contractual arrangements.

2.2.2 Category #2 – Capital Goods

This is a complex area and so no reductions are expected in the short term.

Short term actions will be for appropriate staff within TBG to develop an understanding of category #2 emissions (embedded carbon), and to identify a process for calculating the flow of embedded carbon through the organisation.

2.2.3 Category #5 – Waste Generation

TBG do not currently measure or monitor the volume or types of waste that are generated by the business.

In the short term TBG will develop processes for understanding the volumes and types of waste that is generated by the company, and begin to make regular measurements of all categories of waste

TBG will also engage with the waste hierarchy and identify options for preventing waste, reducing waste, reusing potential waste, recycling and/or recovering waste before disposing of items.

2.2.4 Category #6 – Business Travel

Data regarding business travel in a personal private vehicle is already measured through the expenses system, on the basis of pence per mile. *(In the medium term the type of vehicle used should be recorded)*

Other business travel (miles/emissions) is not recorded. Therefore in the short term TBG will devise a method of capturing the data needed to calculate emissions from all types of business travel on a continuous basis. This will include

- Taxis
- Bus
- Train
- Ferry
- Air travel
- Bicycle
- All other forms of travel used for business

2.2.5 Category #7 – Employee Commuting

Data on employee commuting is not currently collected. Therefore in the short term TBG will devise methods of statistical analysis that will identify the emissions that can be appropriated to employee commuting. This is employee travel that is not contained within Scope #1 or Scope #3 Category #6.

Once the method of identifying the approximation through statistical analysis has been defined, ongoing methods of refining the approximation to become more accurate will be undertaken.

2.3 Verified Carbon Reduction Standards

In the short term TBG should review carbon neutrality and net zero standards to understand which standard is best for the organisation and when engagement with a standard should commence. Following this review TBG will make a decision on fully engaging with a standard or continuing to reduce carbon without adhering to a specific methodology or standard.

Engagement with a verified standard will allow TBG to publicly claim that the company has been verified to be carbon neutral or net zero without anyone being able to allege green-washing or make any other kind of slur against the company

The two top standards for carbon neutrality are PAS2060 (soon to be ISO 14068) and SBTi (Science Based Targets initiative). Other standards are available but less prestigious than these two.

3 Medium Term Planning & Reductions

To 30th April 2031

3.1 Scope #1 and #2 Emissions

3.1.1 Buildings

All other operational factors being considered, where it is possible to remain as operationally efficient from alternative buildings, only carbon neutral buildings should be used by TBG, and preparations should be made for this possibility.

In the first instance TBG will negotiate with current and/or future landlords that for continued occupation of buildings they will need to be rated as carbon neutral.

Carbon neutral means that for all the calculated emissions for the building will either be offset by on-site renewable generation and carbon offsets from a reliable source such as UN, or Gold Standard.

Where TBG has full control of a building actions will be undertaken to make such buildings carbon neutral.

3.1.2 Fleet

3.1.2.1 Operational Vehicles

By the end of the medium term TBG will have a full plan to fully de-carbonise the whole fleet of operational vehicles by 2045 (over 14 years)

3.1.2.2 Executive and Staff Vehicles

By the end of the short term it is expected that the whole fleet of Executive and Staff Vehicles will be based on electric propulsion.

During the medium term action and planning should be undertaken to ensure that recharging these vehicles always uses zero carbon electricity.

3.2 Scope #3

3.2.1 Category #1 – Purchased Goods and Services

All new and renewed agreements for goods and services will include terms that mandate TBC receiving carbon reduction plans from suppliers, and each supplier demonstrating year on year reductions in total emissions (including scope 3)[1]. The only exceptions will be when companies do not have the data, or there is a defined and significant business reason for omission.

Where contracts are ongoing and do not need to be renewed or updated, then TBG will work with these suppliers to ensure they engage with carbon footprinting, and produce carbon reduction plans that are meaningful and achievable.

TBG will also work with the most important, and/or most emission intensive suppliers to ensure that scope #3 category #1 emissions are being reduced.

By the end of this period TBG will have implemented a carbon accounting and tracking system for the supply chain, to ensure all carbon emissions within the supply chain are accounted for and can be reduced.

[1] Terms may include financial penalties, to cover the cost of carbon offsets that TBG will need to pay when a supplier does not meet their commitments

3.2.2 Category #2 – Capital Goods

In the medium term TBG will acquire the information needed to calculate the carbon content of goods purchased and sold through the organisation, and devise accounting processes to track the input carbon and outgoing carbon as goods flow through the organisation.

3.2.3 Category #5 – Waste Generation

By April 2031, TBG will understand the materials that enter into each of the waste streams. In that time policies will have been devised and enforced to align with the waste hierarchy. Meaning that wherever possible waste will be being prevented, reduced or reused. If this becomes impossible then recycled, recovered before final disposal.

Using these policies the total waste will be reduced and therefore the carbon associated with disposal will also be reduced. Carbon accounting will be conducted through publicly available data, until such time as scope #3 category #2 accounting is in place.

3.2.4 Category #6 – Business Travel

TBG will account for all carbon involved in business travel using publicly available data for the carbon intensity of each type of travel.

Business strategies and policies will be devised to optimise the carbon intensity of business travel and reduce the overall carbon emissions.

3.2.5 Category #7 – Employee Commuting

Employee commuting emissions will be refined from the initial statistical basis for identifying emissions to a reasonable certainty of the emissions due to commuting. This data will be collected and revised annually.

Appropriate incentives in line with business objectives will be devised to minimise or offset carbon emissions from commuting.

3.3 Verified Carbon Reduction Standards

If the decision, following the review into verifiable carbon neutrality standards, is to engage with one of these standards, then this engagement will commence no later than 30th April 2031. By this date, if engaged, then TBG will also be publishing the require information for reliable demonstration of carbon reductions.

All verified carbon neutrality standards require offsets to be purchased where a company has not reached net zero. During the medium term period TBG will commence the purchase of carbon offsets to mitigate residual carbon.

4 Long Term Planning & Reductions

By 30th April 2045

Long term is about adjusting plans to align with reaching net zero at the right time, and implementing reductions from the accounting which will have been fully implemented by the end of the medium term.

4.1 Scope #1 and #2 Emissions

4.1.1 Buildings

Over the 14 years between 2031 and 2045 TBG will enact the planning that has been undertaken to ensure that all buildings used by TBG are carbon neutral or net zero.

4.1.2 Fleet

During the medium term period a full and detailed plan will have been devised to bring the operational fleet to zero emissions. Between the end of the medium term and the end of the long term period, that plan will be enacted so that the operational fleet will have zero emissions by 30th April 2045. The plan for zero emissions 2045 will be tracked and reviewed annually to ensure the goal of zero emissions by 2045 is reached.

The Executive and Staff vehicles will be 100% EV before the start of the long term period, and should also only be using zero carbon electricity. By the end of the long term period this will be guaranteed.

4.2 Scope #3

4.2.1 Category #1 – Purchased Goods and Services

By the start of the long term period most or all goods and services should have agreements that include the ability for TBG to account for actual carbon emissions from each supplier, and for those suppliers to be reducing their emissions in line with SBTi or PAS2060. Any suppliers not willing to reduce their emissions will be replaced long term, or contribute to TBG net zero efforts.

During this period TBG will be able to fully and accurately account for carbon emissions from the supply chain, and track reductions, with the aim of the supply chain being fully carbon neutral by 30th April 2045. Accounting and tracking of emissions will be done throughout the period to ensure TBG meets the goal of net zero by 2045, and can take corrective action if necessary,

4.2.2 Category #2 – Capital Goods

At the start of this long term period TBG will implement a carbon accounting system that will be able to account for addition of carbon to the company through the purchase of goods, and the removal of carbon from the company when these goods are sold or otherwise disposed of. This accounting system should be fully commissioned and operational no more than 3 years into this period

When capital goods carbon flows are visible through the organisation, management efforts will be made to ensure only low carbon goods are purchased (that do not flow out of the organisation), and that over time there is no increase in the retained carbon within the organisation.

4.2.3 Category #5 – Waste Generation

By the start of the long term period, the waste streams should be understood by TBG and somewhat optimised in relation to the waste hierarchy. This optimisation will continue throughout the long term period.

In addition all efforts will be made to dispose of the minimal amount of waste to the absolute limit of the company's capability.

4.2.4 Category #6 & #7 – Business Travel & Employee Commuting

Expectations of what will be required from employees when travelling or commuting will be put into policy documents during the medium term, or early in the longer term period.

Over the longer term period through the accounting and tracking that TBG will be doing, it will be expected that all business travel and commuting will be zero carbon by 30th April 2045.

This will probably be easier than expected as most vehicles by this time will be EV or operate on non-carbon technologies (including taxis & busses), electrified rail travel will zero emissions due to the de-carbonisation of the grid. Some business travel may need to be mitigate.

4.3 Verified Carbon Reduction Standards

During the longer term period TBG should be following the guidance of one of the main carbon neutrality standards, and proving that the company is on track to reach net zero by 2050 (SBTi requirement) and hopefully by 2045.

5 Summary

This carbon reduction plan is divided into 3 timespans for achievements. The short term should be achieved within this or the next financial year, the medium term by 2031 and the longer term for net zero by 2045.

All three scopes of carbon emissions are accounted for within this plan and scope #3 emissions are sub-divided into the appropriate categories relevant to T Brown Group.

5.1 Short Term

5.1.1 Scope #1 & #2

- Buildings will only operate using zero carbon energy when directly purchased by T Brown Group
- Where the energy supply is controlled by landlords, negotiations will be held with the landlord to ensure they are only using zero carbon energy.
- The energy performance of operational fleet vehicles will be improved by the introduction of a new and improved telematics system
- Operational fleet optimisation will be undertaken to reduce the size of vehicles where this is possible and improve the overall fuel performance of the fleet.
- Other vehicles will all become lower carbon electric vehicles.

5.1.2 Scope #3

5.1.2.1 Category : Purchased Goods and Services

- For the highest emission companies, identify actual emissions attributable to them (rather than spend conversions), and engage with them to reduce emissions together
- Reassess and redefine procurement processes to account for carbon accounting, recording and reduction in potential new suppliers, and engage in similar work with current suppliers.

5.1.2.2 Categories : Waste, Travel, Commuting

- Engage with optimising each category, and the availability of data. Enable robust methods of data collection for each category
- Define carbon accounting practices for each category

5.2 Medium Term

5.2.1 Scope #1 & #2

- Plans will be drawn up for the occupation of building to only be using carbon neutral buildings by the end of the medium term period
- A full glide path will be planned during this period for the fleet to be 100% carbon neutral before 2045. This will include both operational vehicles and staff vehicles ensuring that recharge or other fuel is fully carbon neutral.

5.2.2 Scope #3

5.2.2.1 Category : Purchased Goods and Services

- Extend the 'actual carbon emissions' data collection to all existing companies as far as possible.
- Use the updated procurement process in supplier selection and ensure that only suppliers who are measuring their full carbon footprint, and have a carbon reduction plan are used, unless there are exceptional business reasons for not doing so.
- Define an carbon accounting system that can record and track supplier emissions and identify companies that are reducing (or increasing) their emissions.

5.2.2.2 Category : Capital Goods

- Acquire the information needed on all capital good to be able to define a carbon accounting system for goods, that will eventually be able to record and track the input and output of embedded carbon within capital goods

5.2.2.3 Category : Waste

- Engage with the waste hierarchy, and devise policies to optimise waste streams so that the minimal amount of waste disposal occurs
- Account for all waste disposal via the various waste streams throughout the organisation

5.2.2.4 Category : Business Travel

- Define an carbon accounting system that can record and track all business travel through whatever mode(s) of transport are used.
- Over time use this accounting system to devise travel policies that will minimise carbon emissions[1]

5.2.2.5 Category : Employee Commuting

- Refine data collection from statistical averages to more detailed analysis of carbon emissions for each employee
- Define incentive schemes or other behaviour change models that will reduce the carbon emissions from commuting[2]

5.2.3 Verified Carbon Reduction Standards

- Engage with one of the carbon reduction / carbon neutrality standards that provides public verification of the progress that T Brown Group is making to net zero

[1] Use of taxis that are electrified and trains, post de-carbonisation of the grid will automatically mean these modes of transport are zero carbon.

[2] This could be cost neutral as the incentive may be set at the level of the cost of carbon offsets that would otherwise need to be purchased.

5.3 Long Term

5.3.1 Scope #1 & #2

- By 2045 T Brown Group will only be using buildings that are guaranteed to be carbon neutral
- Over the longer term period to 2045 the fleet management will enact the fleet carbon reduction planning to ensure the whole fleet, regardless of vehicle type will be carbon neutral. This progress will be fully tracked and adjusted annually if the reductions do not meet the plan.

5.3.2 Scope #3

5.3.2.1 Category : Purchased Goods and Services

- At the start of this period T Brown Group should be able to accurately account for all emissions within the supply chain, and all suppliers to T Brown Group should have carbon reduction plans to match those of T Brown Group.
- Working together with the supply chain all companies supplying T Brown Group will minimise emissions and reach net zero together.

5.3.2.2 Category : Capital Goods

- At the start of the long term period T Brown Group will devise a carbon accounting system that will be able to account for embedded carbon arriving into the company on purchase and leaving the company on sale or disposal
- At the end of the period all carbon entering and leaving the company will be fully accounted for, tracked and recorded.

5.3.2.3 Category : Waste

- T Brown will fully adopt the waste hierarchy throughout its operations
- Carbon emissions in the disposal of waste will be fully reduced to being carbon neutral by 2045[1].

5.3.2.4 Category : Business Travel & Employee Commuting

- Company policies will have been defined that eliminate carbon from business travel and commuting by 2045. This may be easier that expected due to grid decarbonisation and new technologies

5.3.3 Verified Carbon Reduction Standards

- T Brown Group will follow the guidance associated with the chosen carbon reduction and verification standard.

[1] By 2045, waste disposal may already be carbon neutral due to government policy and new technologies used by waste disposal companies