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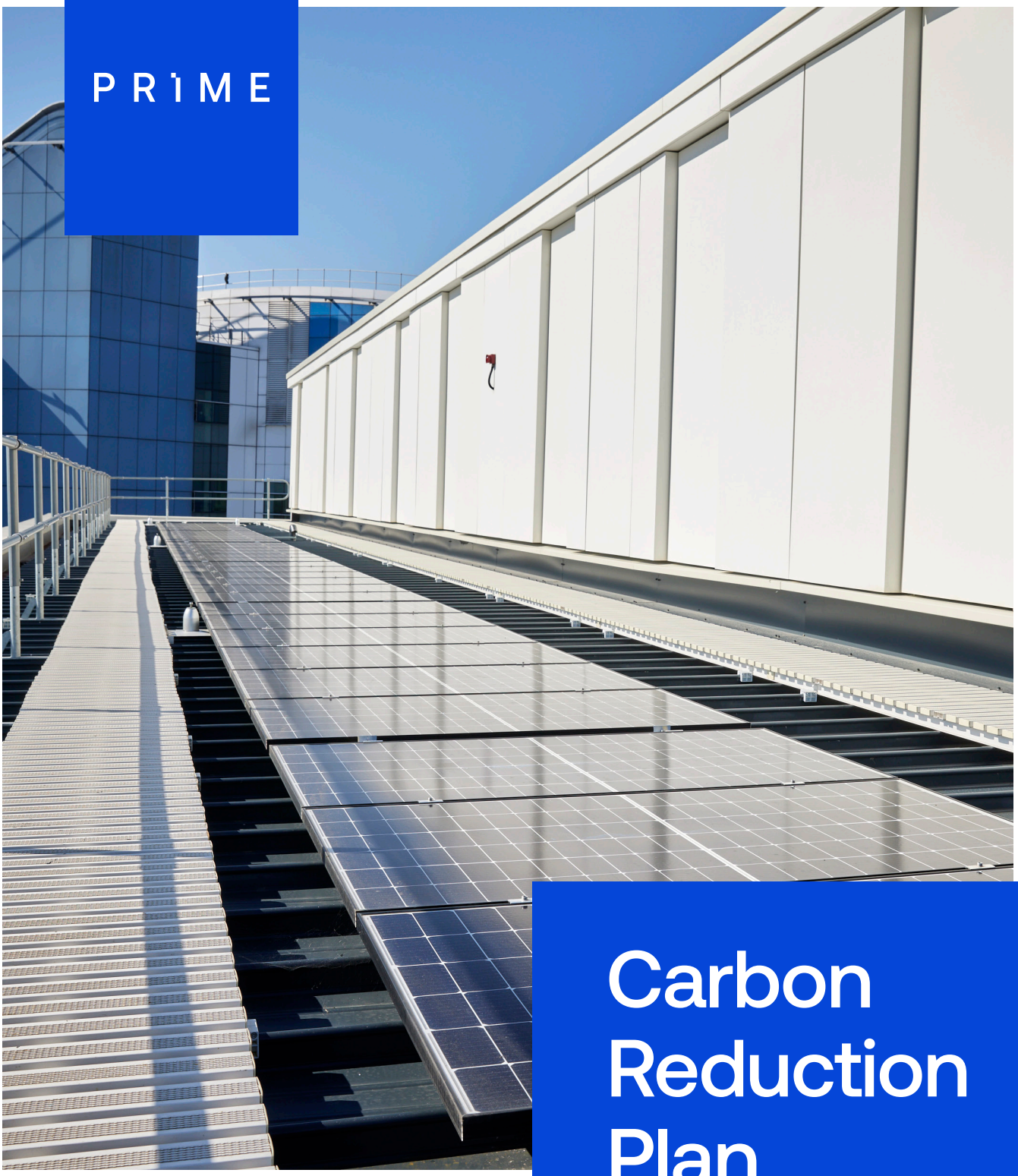


Carbon Reduction Plan

June 2025

Certified B Corporation

INVESTORS IN PEOPLE®
We invest in people Gold

Introduction

Prime plc undertakes property development, master planning and delivery whilst unlocking the most complex estate management challenges alongside a strong cultural affinity to the environment and nature. For many years we have been making decisions that have sought to reduce our greenhouse gas emissions.

Prime plc is a B Corporation and certified to ISO 14001.

Specific targeted action commenced in 2021 as we educated ourselves on the scientific consensus around carbon emission measurement. In 2021, we took the strategic decision to procure 100% renewable electricity which has meant our Scope 2 emissions have been 'Net Zero' (when reporting on a market basis) since 30th October 2021. In 2022, we agreed to purchase circa 24 acres of farmland adjacent to an existing Worcestershire Wildlife Trust reserve to develop our own woodland and 'offset' our emissions once our ongoing minimisation strategies have been realised. We anticipate we will be 'climate positive' from 2030 onwards based upon our plans for planting trees on our land (assuming the calculated Pending Issuance Units (PIUs) are converted into Woodland Carbon Units (WCUs) in the future). This intervention has been incredibly positive for our team as it has engaged them in the importance of measuring, reducing and then offsetting our carbon. In 2025, we will have completed the design, diligence and approval process and look forward to implementing our plans. The result will be that Prime is anticipated to be 'carbon neutral' from a scope 1 and 2 perspective (assuming the calculated PIUs from the woodland are converted to WCUs in the future) by the end of 2026 when reporting on a market basis.

Commitment to achieving Net Zero

Prime plc is committed to achieving Net Zero emissions, within the context of reporting required by clients, Government and the NHS, by the end of 2030 based upon the following boundaries:

- Our activities including the design and specification of buildings, business development and project development.
- The process of selection of the contractor and contract management. (The contractor's activities are deemed outside of this boundary as Prime does not have operational control over how contractor activities are performed).
- The process of selection of a funder.

Achieving a Net Zero position by 2030 is an enormous task for the business and not something we can achieve alone. Our guiding principles to help us implement the objectives are:

- To incorporate standardised robust measurement methodologies into the project design and development processes.

  Without a standardised approach, we will be unable to look consistently across our work and learn which interventions in the design process have the greatest impact on the reduction of CO_2e during the design and specification process.

- Educate all partners on their roles in meeting our objectives.

  Property development is becoming increasingly complex. We are always going to need to support occupier clients in particular by recognising the importance of finding a balance between the lowest short-term financial cost and long-term planetary cost. Our team will maintain a high level of knowledge around specification choices to enable wise decision-making to reduce the amount of carbon offsetting.

- Embrace cost-effective market innovations.

  Significant innovation into new materials and processes within the development and construction industry is anticipated as a result of the search for more sustainable techniques and infrastructure. For example, the use of steel and concrete with highly recycled elements (if performance remains unchanged) could have a material impact on upfront embodied carbon.

How we engage

Monitoring and Measurement

Our emissions are monitored and measured by our Sustainability Corporate Function. Reporting to external auditors is an annual task, whilst the Board and business receive an update on our progress on a 6-monthly basis.

Employee Engagement

Internal updates against our aims and objectives are reported to the business every 6 months, within our Business Update sessions and led by our Sustainability Corporate Function Lead.

'Knowledge Share' sessions are planned per year where we provide business-relevant education to our team on the science behind climate change and the targets and measures we as a business are introducing. The most recent sessions have been on using our Prime Woodland to offset our Scope 1 and 2 carbon and then the methodology we have learnt in minimising and then measuring the residual carbon equivalent from our development projects.

Stakeholder Engagement:

Detailed discussions are held within our project environment with clients and the design team in a process that we know as 'brief setting'. The brief setting now includes an 'Upfront Embodied Carbon design target' based upon the LETI (London Energy Transformation Initiative).

In addition, we are an active member of the British Property Federation.

Reporting and Transparency

As part of our normal course of business, we report on our carbon emissions to many external interested parties. These include:

- Within our audited annual accounts.
- BSi, as part of being certified to ISO 14001.
- B Corp, within our Impact Report.
- Within our social value reporting.
- Investors, on the performance of the asset they are seeking to fund.

Continuous Improvement

Project improvement is captured within our 'Project Milestone' review process. Best practice and opportunities to improve are captured in detail and a structured methodology is used to disseminate the outcome throughout the business and update our systems as a result.

Our Environmental Management System certified to ISO14001, encourages us to set new challenging targets on an annual basis and these are captured within our annual implementation planning process for the business as a whole.

Regulatory Compliance

Our Sustainability Corporate Function has the responsibility of maintaining current knowledge of existing and proposed regulatory and legislative requirements. We employ a specialist consultant to provide quarterly updates on environmental legislation changes and requirements. In addition, at a project level, we employ specialist sustainability advisors, CPW, to support us in the technical knowledge of building design and specification as well as the methodology necessary to reduce the upfront embodied carbon of our projects.

Budget and Financial Analysis

We have invested heavily in creating the environment to enable us to offset our current and historic scope 1 and 2 emissions. We have bought 24 acres of land to the west of our offices in Worcester. We are currently working with the Forestry Commission to obtain consent to use the land for the purpose intended. We are confident of approval due to the carefully design scheme providing a rich mix of habitats. It is expected that planting will commence in 2025.

Our externally verified calculations have confirmed that planting the Woodland will not only offset (subject to the PIUs being converted into carbon credits) our annual scope 1 and 2 emissions for some years in the future but also our entire 27-year history.

In addition, using the framework provided by The Oxford Principles for Net Zero Aligned Carbon Offsetting, LETI, and RIBA, we have been developing a methodology at project level to calculate the upfront embodied carbon to understand the most effective ways of reducing embodied emissions through design; as well as determining an offsetting value associated with these emissions. We are also working alongside third-party partners to understand the viability of offsetting residual embodied carbon and we are engaging with external experts to further drive innovation in the UK nature-based solution market.

Narrative on emission categories

Scope 1

We started examining our Scope 1 emissions in 2021. We realised that our photovoltaic (PV) panels also generate emissions. Therefore, we have calculated the resulting carbon and intend to offset the amount of carbon resulting from their use (since 2015). However, we have not included this within our dataset because the conversions are derived from the Danish utility study "Vattenfall" from 1999. It looked at only 3 countries, namely, Japan, Sweden and Finland and really technology has moved on since then and also Department for Energy Security and Net Zero and the Department for Business, Energy & Industrial Strategy is the UK's source for emissions compliance with the GHG protocol and doesn't provide emissions calculations for PV.

Our other scope 1 emissions arise from our fleet of vehicles. Our fleet comprises hybrid or fully electric vehicles (EVs). We have several EV points at the office to enable recharging whilst at work on our premises.

Scope 2

Scope 2 emissions are generated from energy procured from the grid. We have no gas or oil supply to our premises. Since 30th October 2021, we have procured renewable energy and retained a certificate supplied by British Gas that the electricity supplied will be backed by renewable generation Guarantee of Origin certificates until 29th October 2026. Therefore, when reporting on a market basis, our Scope 2 emissions have been ‘Net Zero’ since 2021.

Scope 3

Category 4 - Upstream Transportation and Distribution

Within the boundary of the emissions reported, it is problematic, due to the nature of our business to determine the transport element of the goods supplied to our offices. However, we have determined the transmission and distribution of the electricity supplied.

Category 5 – Waste

Our waste is dealt with by the Agents of our offices and transferred to licenced carriers to local waste management facilities. In Worcester, the majority of ‘household’ waste is taken to a waste-to-energy plant. In addition, recycling is taken for sorting to materials recycling facilities. To determine the amount of waste the number of bags is counted and an assumed weight is given to each.

Category 6 – Business Travel

This category includes emissions from trains, aircraft and passenger cars of employees for business-related activities in vehicles owned or operated by third parties.

Category 7 – Employee Commuting

Due to the location of our offices, most commuting takes place by car. However, to minimise emissions we operate a hybrid working policy where appropriate. We have determined the distance between people's homes and our premises and determined the type of vehicle they drive. This has resulted in an informed estimate of the emissions. In 2024, however, we have launched a new way of tracking mileage. We are discuss with our team how we can make a

positive impact on these figures whilst maintaining our general encouragement for people to be in the office to support wellbeing and team culture.

Category 9 - Downstream Transportation and Distribution

This is not relevant to our company's reporting of GHG emissions.

Baseline Emissions Footprint

Whilst we have data on our Scope 1 emissions back to 2015 and our Scope 2 emissions back to 1999, we have only recently started to understand our Scope 3 emissions as defined under the requirements of PPN 06/21.

We have chosen to report our emissions both on a 'location' and 'market' basis.

To this end, we have decided to have 2022 as our baseline year, namely:

Baseline (Located based)

Baseline (Location based)

Year: 2022		
Emissions	Total ($kgCO_2e$)	Total (tCO_2e)
Scope 1:	3812.00	3.81
Scope 2:	20768.02	20.77
Scope 3:		
Cat 4:	1740.59	1.74
Cat 5:	29.42	0.03
Cat 6:	15673.84	15.67
Cat 7:	42714.66	42.71
Cat 9:	Not reported	
	Total Emissions:	84.74

Baseline (Market based)

Year: 2022		
Emissions	Total ($kgCO_2e$)	Total (tCO_2e)
Scope 1:	3812.00	3.81
Scope 2:	0.00	0.00
Scope 3:		
Cat 4:	1740.59	1.74
Cat 5:	29.42	0.03
Cat 6:	15673.84	15.67
Cat 7:	42714.66	42.71
Cat 9:	Not reported	
	Total Emissions:	63.97

We will report annually on our emissions.

Current year (Location based)

Year: 2024		
Emissions	Total ($kgCO_2e$)	Total (tCO_2e)
Scope 1:	3329.37	3.33
Scope 2:	1957.23	1.96
Scope 3:		
Cat 4:	172.99	0.17
Cat 5:	7.69	0.01
Cat 6:	22253.09	22.25
Cat 7:	27909.37	27.91
Cat 9:	Not reported	
	Total Emissions:	55.63

Current year (Market based)

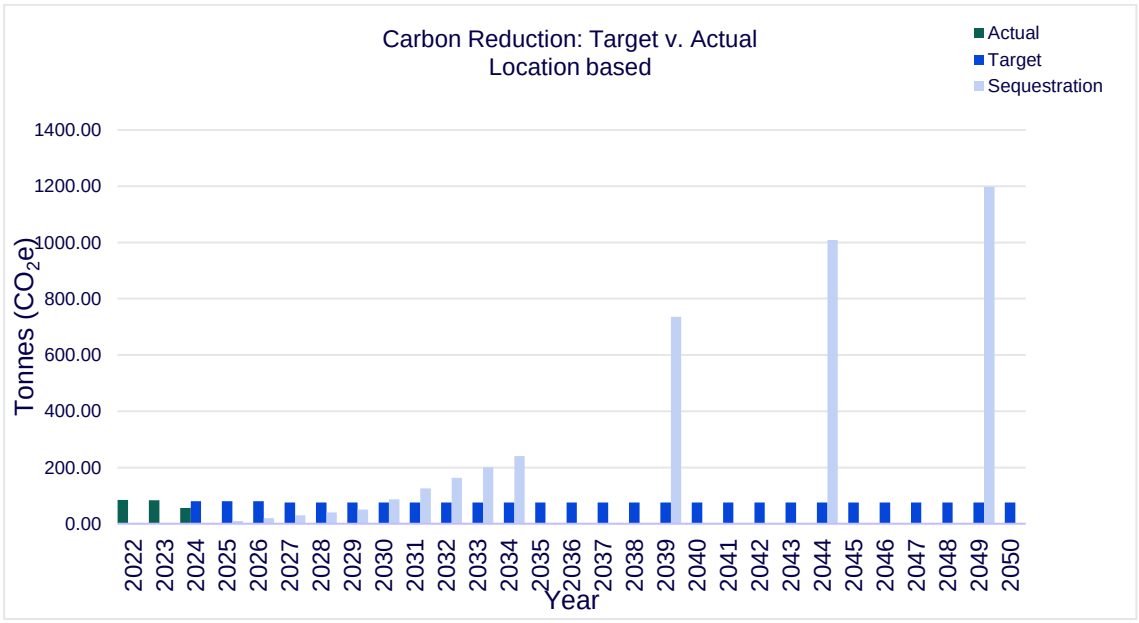
Year: 2024		
Emissions	Total ($kgCO_2e$)	Total (tCO_2e)
Scope 1:	3329.37	3.33
Scope 2:	0.00	0.00
Scope 3:		
Cat 4:	172.99	0.17
Cat 5:	7.69	0.01
Cat 6:	22253.09	22.25
Cat 7:	27909.37	27.91
Cat 9:	Not reported	
	Total Emissions:	53.67

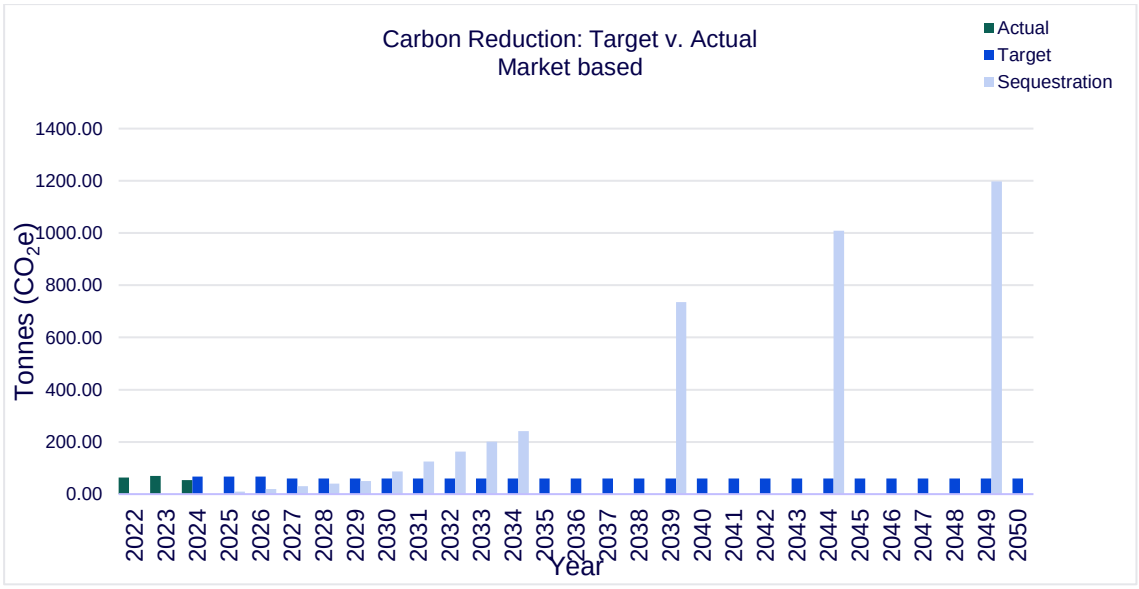
Current Emissions Reporting

We understand that these emissions have been reported in ‘absolute’ terms therefore if our activities increase emissions may increase accordingly.

Emissions reduction targets

Whilst we continue our progress toward achieving Net Zero and beyond (see below for our Corporate Strategies and KPIs) we project to achieve Net Zero by the end of 2030 using a location-based and slightly sooner using a market-based methodology when taking into account our proposed Woodland sequestration represented in green:





Note: the woodland sequestration is based upon the generation of a PIU. It is a kind of promissory note – confirming an estimated amount of the woodland's future potential carbon capture. Over time, as the trees grow, the PIUs are converted in sequence to a different type of credit – a WCU - representing the carbon actually captured by the trees.

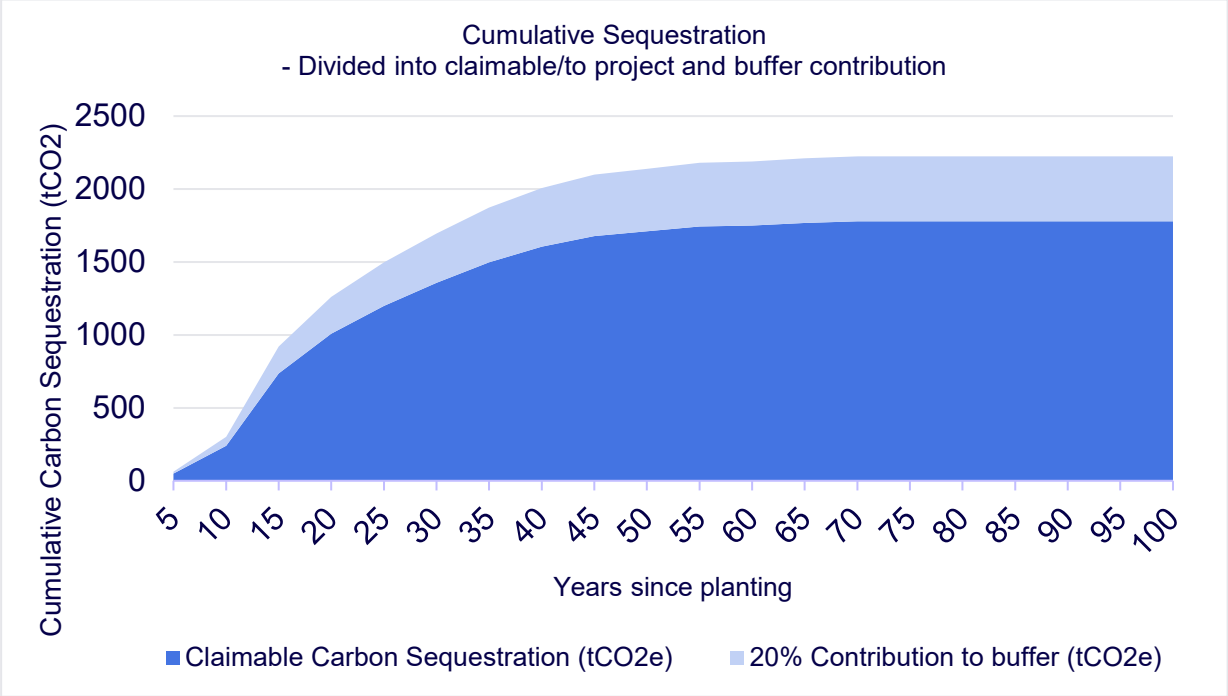
Carbon Reduction Projects

Completed Carbon Reduction Initiatives

Since 2021, we have invested more than £1m in updating and improving our office heating, cooling and lighting. We split the project across two years to reduce the impact on how we work. The project has involved replacing the entire comfort cooling and lighting equipment with greatly enhanced systems that not only improve the working environment for our people but also use significantly less energy. The net result is dramatic. Data shows we have almost reduced our location-based tCO_2e emissions in 2024 by 92.7% when compared to 2021, we have been procuring renewable electricity have achieved a 'Net Zero' of Scope 2 emissions over that time when reporting on a market basis:

Our offset strategy

In 2022, we agreed to purchase circa 24 acres of farmland adjacent to an existing Worcestershire Wildlife Trust reserve to develop our own woodland. This will be planted with an appropriate mix of Douglas fir, Norway spruce and mixed broadleaves. The cost of this investment has been in the order of £400,000. In 2025, we will have completed the design, diligence and approval process and look forward to implementing the plan. It has been calculated that over the life of the project, some 1779 PIUs will be generated. A PIU is effectively a 'promise to deliver' a WCU in future, based on predicted sequestration. It is not 'guaranteed' and cannot be used to report against UK-based emissions until verified. However, it allows Prime to plan to compensate for future UK-based emissions and make credible statements in support of woodland creation. The graph below shows the estimated cumulative sequestration over 100 years:



Corporate Strategies

Our 2021 Five-Year Strategic Plan requires us to achieve the following sustainability and nature-based targets:

- Net-zero – Scope 2 emissions from electricity when reported on a market basis achieved from 30th October 2021.
- Net-zero carbon – Scope 1 and 2 emissions by the end of 2025. (Assuming the PIUs from our Woodland have been converted into carbon credits in the future).
- Net-zero upfront embodied carbon – development project on site in 2023. (Our first Net Zero upfront embodied carbon project commenced in January 2024)
- Biodiversity Net Gain (BNG) – all development projects by the end of 2021 to achieve a minimum of 10% BNG. (All projects since 2021 have achieved at least 10%)

We have been delighted by the collective response to this strategy across the business with people working hard year-on-year to meet our joint ambitions.

To maintain focus and enthusiasm we agreed on a new 5-year strategy for 2024 – 2029. The 'Environment Business Pillar' focuses on our projects due to the enormous opportunity for positive impact. We have agreed as a business that:

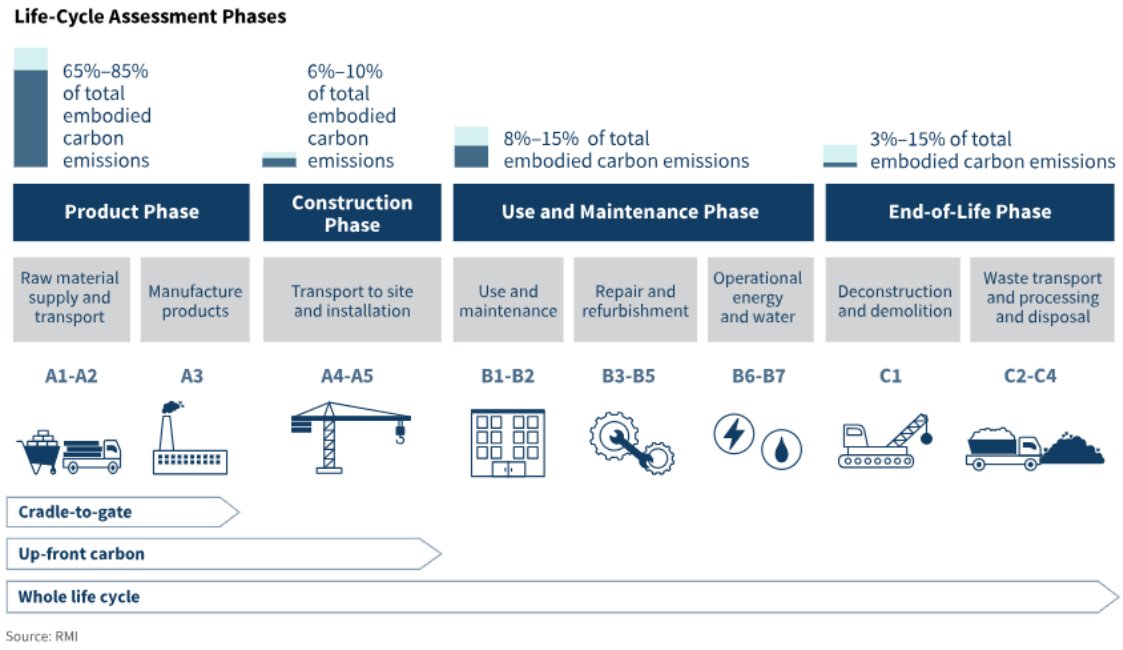
- All Prime projects reaching financial close in 2026 and beyond will strive to be Net Zero upfront embodied carbon and deliver a 15% biodiversity net gain.
- The ongoing improvement in reducing the carbon emitted (regardless of our ability to offset within the Prime Woodland) is being managed as a key part of our 14001 Environmental system. The table below sets out our current KPIs:

Key Performance Indicator:	Target:	Responsible Person(s):	Actual for 2024:
E1. Energy use	Energy used not to exceed 18GJ per annum/100m^3	All staff	4.27 GJ per annum/100m^3
E2. Renewable Energy	Generate over 45 MWh/annum of renewable energy from photovoltaics.	HQ Property Management Corporate Function to monitor.	49 MWh produced
E3. Waste	Waste not to exceed 25 bags of general waste and 30 bags of recycling waste per month.	All Staff	Average 20 general waste/month Average 12 recyclable/month
E4. Carbon Emissions	Average CO_2(kg) per mile per annum not to exceed 0.27kg.	All staff driving in the course of business.	0.15kg / mile 628.37 miles/employee 97.81kg CO_2 per employee
E5. Paper Use	Average number of sheets of paper used per person per annum not to exceed 1,000	All staff	859 sheets pp/annum
E6. Water use	We will ensure that water consumption per member of staff on average is below 10m^3 per annum from 2021.	All staff	3.74m3 pp/annum

Future reporting

Embodied carbon emissions

Embodied carbon represents the millions of tonnes of carbon emissions released during the lifecycle of building materials, including extraction, manufacturing, transport, construction, and disposal:



Building design and specification can lead the way in going beyond operational carbon, the emissions associated with the energy used to operate the buildings, through addressing embodied carbon within projects. Embodied carbon refers to the greenhouse gas emissions that are associated with materials and construction processes over the entire life cycle of a building.

Currently, the building industry generates almost 40% of annual CO_2 emissions, illustrating that significant reductions are necessary to achieve decarbonisation targets. Embodied carbon alone accounts for 11% of global annual emissions and is connected to issues of public health and equity. Embodied carbon must become a focus of emission reductions within the industry.

Careful specification of materials can reduce embodied carbon, including using low-carbon, carbon-neutral, or even carbon-storing materials. Most carbon-storing materials are plants (wood, hemp, straw, bamboo, algae) that have sequestered carbon during their growth before being transformed into a building material. Additionally, using recycled materials or reclaimed materials can reduce the emissions associated with manufacturing new materials.

Embodied carbon reductions can also be achieved through material efficiency and optimised design. For example, the use of modular or prefabricated construction techniques can optimise the use of materials, resulting in minimal waste material that could be wasted.

Designing buildings with a focus on durability and ‘de-constructability’ reduces the need for frequent replacements, improves adaptability, extends the building’s useful life, and facilitates better end-of-useful life management. Additionally, using passive design strategies, such as better insulation and orienting buildings to take advantage of natural light and ventilation, can reduce the need for energy-intensive mechanical systems that come with high embodied carbon footprints.

The UK Net Zero Carbon Buildings Standard (NZCBS) Pilot Version, published in September 2024, sets out technical guidance on how buildings can meet net zero standards through defined performance limits, carbon targets, and supporting evidence requirements. This provides a clear methodology for assessing both operational and embodied carbon. As the industry moves towards alignment with this framework, we await the release of Version 1, expected in late 2025, which will introduce a formal verification process to support consistent and credible claims of net zero carbon alignment.

Our first Net Zero upfront embodied carbon project commenced in January 2024 reached Practical Completion in March 2025. To support the scheme’s environmental performance and net zero carbon design, there is a roof mounted solar PV array designed to provide 45 kilowatts peak power output, and an all-electric mechanical services strategy, including air source heat pumps and mechanical ventilation with heat recovery to non-clinical areas. This project forms the basis of our ongoing work on creating a methodology to reduce upfront embodied carbon as discussed above.

Scope 3 Category 1 Purchased Goods and Services emissions

We purchase goods and services to help us to deliver our services. We acknowledge that this may potentially generate a large quantity of emissions in our carbon footprint. Whilst we understand it is not a requirement for this CRP, we will endeavour to determine our Scope 3 Category 1 emissions by 2026.

Declaration and Sign-off

This Carbon Reduction Plan has been completed in accordance with PPN 06/21 and associated guidance and reporting standard for Carbon Reduction Plans. Emissions have been reported and recorded in accordance with the published reporting standard for Carbon Reduction Plans and the GHG Reporting Protocol corporate standard and uses the appropriate Government emission conversion factors for greenhouse gas company reporting.

Scope 1 and Scope 2 emissions have been reported in accordance with SECR requirements and the required subset of Scope 3 emissions have been reported in accordance with the published reporting standard for Carbon Reduction Plans and the Corporate Value Chain (Scope 3) Standard.

This Carbon Reduction Plan has been reviewed and signed off by the board of directors.

Signed on behalf of Prime plc:

Leighton Chumbley
Chief Executive

Date: 04.06.2025

Assumptions and Caveats

Calculation of emissions

The most appropriate conversion from the Department for Energy Security and Net Zero/Department for Business, Energy & Industrial Strategy has been applied to generate tonnages of carbon emissions. We have due regard for The Oxford Principles for Net Zero Aligned Carbon Offsetting.

Location and market basis

Emissions have been reported on a 'Location' and 'Market' basis. The location-based method reveals what the company is emitting physically into the air and the market-based approach shows emissions the company is responsible for through its purchasing decisions. Prime has chosen to purchase 100% renewable energy since 2021, which has meant Scope 2 emissions have been 'Net Zero' (when reporting on a market basis) since 30th October 2021.

Scope 1

Mileage has been taken from 2022 and 2024 and multiplied by the appropriate Department for Energy Security and Net Zero/ the Department for Business, Energy & Industrial Strategy condensed set of conversions.

Scope 2

Scope 2 is reported both on a location and market basis as Prime has been purchasing 100% renewable electricity since 2021 through British Gas (backed by renewable generation Guarantee of Origin certificates for the period of 30th of October 2021 to the 29th of October 2026).

Scope 3 – Cat 4 Upstream Transportation and Distribution

Prime has reported the transmission and distribution of electricity using the electricity data for 2022 and 2024 and multiplied by the appropriate Department for Energy Security and Net Zero/ the Department for Business, Energy & Industrial Strategy condensed set of "T&D- UK electricity". This represents the emissions impact of the efficiency losses experienced in transporting and distributing electricity from the power plant to Prime.

Scope 3 - Cat 5 Waste

The waste has been calculated based on counting bags assuming an average rate of 2.5kg per bag. The total weight over a calendar year is then calculated and multiplied by the conversions for 2022 and 2024 respectively. The Department for Energy Security and Net Zero/ the Department for Business, Energy & Industrial Strategy condensed set of conversions does not distinguish between energy recovered from the waste through incineration and subsequent generation of electricity and open or closed loop recycling.

Scope 3 – Cat 6 Business Travel

In 2022, Business Travel was calculated by taking the calendar year data in miles, converting it to kilometres and multiplying it by the 2022 Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy conversion factors for Land - National rail. In 2022, cars, rail and one-plane flight were recorded. The distance of the plane

flight was multiplied by the conversion “Domestic, to/from UK, Average passenger taking into account “RF””. (Air travel emissions are multiplied by the radiative forcing (RF) factor to account for the higher global warming potential from emissions released at higher altitudes).

In 2024, Business Travel was calculated by taking the calendar year data, converting it to kilometres and multiplying it by the 2024 Department for Energy Security and Net Zero conversion factors for Land - National rail. In 2024 car and rail distance travelled was reported. There were no air flights.

Scope 3 Category 7 – Commuting.

The data is derived from the number of miles to and from an employee's place of residence to the office. The following assumptions were made for the 2022 baseline year:

- Working days in 2022 (excluding public): 260.
- Employees holiday allowance: 38.
- An average of 4.5 days sick leave: 4.5.
- Working days (less holiday and sick): 217.5.
- Hybrid working: 63% (Taken from a two-month snapshot of attendance).
- Therefore, days working are 137.
- Commuting in EVs assumed that charged at work therefore removed from calculations as within scope 2.

In 2024, we had a full set of office sign in data on how many days each employee worked in the office throughout the year.

Conversions for 2022 and 2024 were taken from the Department for Energy Security and Net Zero/ the Department for Business, Energy & Industrial Strategy condensed set “Business Travel” – “Cars (by size)”. It is assumed that Category 7 Commuting data is discrete from Category 6 Business travel.

Scope 3 Category 9 – Downstream Transportation and Distribution

This is not relevant to Prime’s activities and is therefore not reported.

Woodland sequestration calculations

The Woodland carbon sequestration has been calculated using the latest WCC Carbon Calculation Spreadsheet and associated guidance. The calculator includes the following:

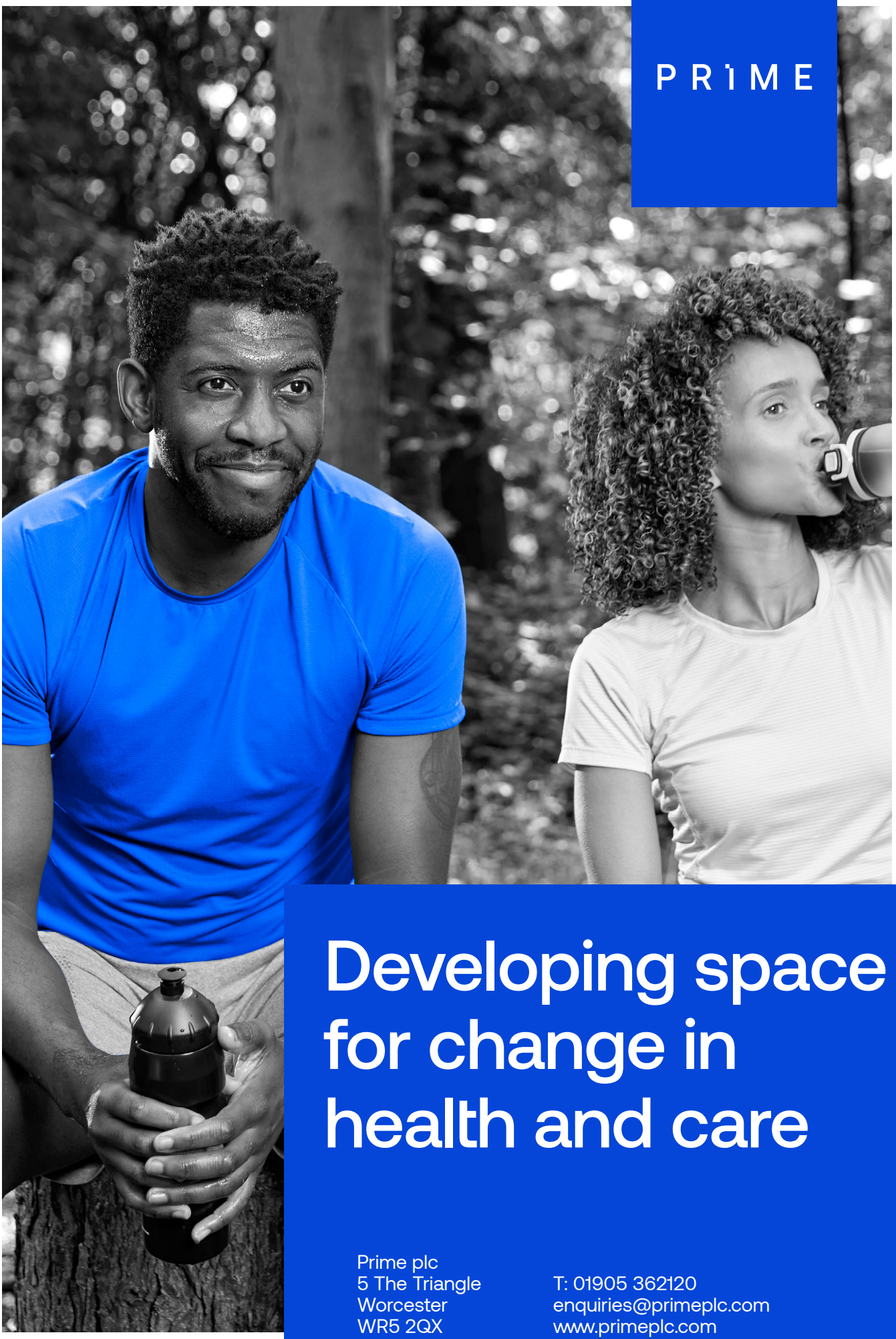
- Emissions from establishment activities, ongoing management and clear-fell.
- Emissions from soil disturbance
- Sequestration in tree biomass, litter and deadwood (and in a limited number of scenarios, soil)

Small projects (5 hectares net planting or less): Can use the 'Small Project Carbon Calculator' which is simpler to complete and conservative. Projects using this prediction tool can use the less intensive 'basic monitoring' from year 15 onwards.

To project the first 5 years of claimable carbon, it has been assumed that 10t would be claimable per year up to the estimated 50t at some point in the future.

END

PRIME



Developing space for change in health and care

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