

# Carbon Reduction Plan

Revision update

Approved by

16 June 2026



## 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 (since 2022) and certified to ISO 14001 (since 2011).

This Carbon Reduction Plan (CRP) has been prepared in accordance with PPN 06/21 and associated guidance and reporting standard for Carbon Reduction Plans, and we will also seek alignment with emerging best practice including the UK Net Zero Carbon Buildings Standard and RICS Whole Life Carbon Assessment guidance where relevant to our activities.

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 reported as 'Net Zero' on a market basis since 30th October 2021 (with location-based emissions reported separately) since 30 October 2021. Prior to this procurement change our scope 2 emissions were circa 31,500kgCO<sub>2</sub>e.

In 2022, we purchased circa 24 acres of farmland adjacent to an existing Worcestershire Wildlife Trust reserve to develop our own woodland to support the neutralisation of residual and historic emissions once our ongoing minimisation strategies have been realised. We anticipate we will be 'climate positive' (Scope 1 and 2) from 2030 onwards based upon our plans for planting trees on our land subject to independent verification and the conversion of Pending Issuance Units (PIUs) into Woodland Carbon Units (WCUs) in line with the Woodland Carbon Code. In 2025, we completed the design, diligence and approval process and in 2026 implemented our plans and completed the planting. Prime will prioritise absolute emissions reductions and will only use high-quality, verified removals to neutralise residual emissions that cannot be eliminated. Accordingly, any 'carbon neutral' 'net zero' claims based on our woodland will be made only once credits are verified and can be legitimately applied to UK-reported emissions.

## 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 principles:

- Our activities include the procurement of design and specification of buildings and property development. Scope 1, 2, and 3 emissions relate to how we conduct our business and are significantly impacted by how we manage and operate our offices as well as how we travel to clients and how we commute.
- While Prime does not have operational control over contractor activities (and therefore this does not form part of our Scope 3), we recognise construction and

supply chain emissions are influenced by decisions we take during the design and diligence period. We will therefore aim to quantify key contractor and supply chain emissions on our new build projects. Where clients are willing to participate, we will adopt a whole-life carbon methodology and available Environmental Product Declarations (EPDs) and databases. By 2028 onward we will seek improved supplier-specific data and contractor reporting to reduce reliance on proxies.

- Educate all partners on their roles in meeting the Governments net zero objectives, including suppliers and contractors, through clear requirements and collaborative delivery.
- We shall embrace cost-effective market innovations in technology to reduce carbon within building products.
- A clear hierarchy of decision making is embedded: avoid emissions where possible, reduce emissions as far as practicable, substitute with lower-carbon alternatives where safe and affordable to do so, and only then neutralise residual emissions using high-quality, verified removals.

## 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. We will implement a data quality and assurance approach (measured/modelled/estimated) and will maintain an auditable evidence pack for all activity data and emission factors used.

### Governance and accountability

Overall accountability for the CRP sits with the Board. Our CEO is the sponsor and the oversees delivery of the Net Zero programme, supported by the Sustainability Corporate Function Lead. Carbon reduction performance and key risks will be reviewed at least twice per year, and key project gate approvals for new builds will include a carbon and nature impact assessment.

### 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 to support us in the technical knowledge of building design and specification as well as the methodology necessary to reduce operational and embodied carbon of our projects, including alignment with the UK Net Zero Carbon Buildings Standard (pilot and subsequent versions) and RICS Whole Life Carbon Assessment where applicable.

## Narrative on emission categories

### Scope 1

We started examining our Scope 1 emissions in 2021. Emissions associated with photovoltaic (PV) panels primarily embodied (upstream) emissions and therefore treated as Scope 3 (capital goods) rather than Scope 1. We quantify PV lifecycle/embodied emissions using appropriate contemporary datasets and proxies where available and will include them within our Scope 3 roadmap where material. Our Scope 1 emissions arise principally from our fleet of vehicles.

Scope 1 (direct emissions)	KgCO <sub>2</sub> e
Baseline year - 2021	7,122
Current full year - 2025	3,542

### Scope 2

Since 30 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 reported zero, alongside separate location-based reporting that reflects the physical grid emissions.

Scope 2	KgCO <sub>2</sub> e
Baseline year – 2021	31,585
Current full year – 2025	0

### Scope 3

#### Scope 3 roadmap

We are collecting data and calculating our Category 6 (business travel) and Category 7 (employee commuting) see table below.

Scope 3	KgCO <sub>2</sub> e
Category 6 (business travel) 2025	18,448
Category 7 (employee commuting) 2025	11,405

The methodologies needed to record all employees' personal cars and emissions levels and the distances they travel into work has been established. In addition, we have a computerised system to record when people arrive in the office which enables an accurate calculation of this measure. A similar process of capturing employee private car details when they undertake business trips has been deployed.

In line with PPN 06/21 requirements we will expand our Scope 3 coverage over time. By the Q4 2027 we will calculate Scope 3 Category 1 (Purchased Goods and Services) and Category 2 (Capital Goods).

## 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 and wider stakeholder expectations. We have chosen to report our emissions both on a 'location' and 'market' basis. To this end, we have decided to have 2021 as our baseline year. We will also maintain a data quality assessment for each emissions category and will improve data completeness and accuracy year-on-year.

## Emissions reduction targets

Whilst we continue our progress toward achieving Net Zero and beyond, we project to achieve Net Zero by the end of 2030. Our priority is absolute emissions reduction across Scopes 1 and 2 and expanding reductions and transparency across Scope 3. We will only apply woodland sequestration to neutralise residual emissions once verified credits are issued and can be legitimately applied, and we will report gross emissions separately from any neutralisation.

### Targets

From our 2021 baseline, we will target (i) at least a 90% absolute reduction in Scope 1 and 2 emissions by 2030 (location-based), with any remaining residual emissions neutralised using verified removals; and (ii) measurement and reduction of material Scope 3 categories, starting with Categories 1 and 2 for development management activity. We will review targets annually as measurement improves.

Scope 1 (direct emissions)	KgCO <sub>2</sub> e	% change from baseline
Baseline year - 2021	7,122	
Current full year - 2025	3,542	50.2% decrease
Scope 2	kWh	
Baseline year - 2021	257,101	
Current full year - 2025	82,968	67.7% decrease**

\*\* Whilst we have hit our target of a 90% absolute reduction in Scope 2 emissions, we have continued investment into our premises to reduce energy consumption more specifically. Since 2023 we have invested almost £500,000 in improvements to lighting and the environmental engineering within the office. This together with more energy efficient computers etc means we now generate more energy from our PV array than we use running our office.

## Carbon Reduction Projects

### Travel

Our business fleet has been steadily moving towards hybrid and all electric vehicles; this will continue as part of car policy. As part of the rolling programme of replacement, we aim to hit our target of a 90% reduction in absolute Scope 1 emissions by 2030.

### Procurement and project delivery

We will embed carbon requirements into new build project briefs, design development and procurement, including: whole-life carbon assessments at defined gateways; upfront embodied carbon targets (kgCO<sub>2</sub>e/m<sup>2</sup>) aligned to recognised benchmarks; and tender evaluation that includes carbon competence, reporting capability and low-carbon methodology. Where practicable, contracts will require contractors to report fuel, electricity, waste and materials data.

## Future reporting

### 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 generate a large quantity of emissions in our carbon footprint, particularly within development projects. We will, where practicable determine our Scope 3 Category 1 emissions during 2026/27 and will also develop Category 2 (Capital Goods) reporting. We will prioritise improvements in data quality via supplier engagement, EPDs and contractor reporting.

## 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. We will maintain an evidence pack for activity data and emission factors and will consider proportionate third-party assurance as our Scope 3 coverage expands.