Carbon Reduction Plan

Scope

This Carbon Reduction Plan applies to all operational, administrative and support activities undertaken by the Drains Direct UK Group. The scope includes all depots, offices, fleet operations, drainage and waste haulage services, CCTV surveying activities, procurement functions and supporting management processes that fall under the Group's ISO 14001 certified Environmental Management System.

The plan covers the identification, measurement and reduction of greenhouse gas emissions associated with Scope 1 direct emissions, Scope 2 purchased energy emissions and selected material Scope 3 emissions, including supply chain activities relating to PPE procurement and HGV acquisition. The scope extends to all employees, agency workers, key suppliers and subcontractors whose activities influence the Group's carbon footprint.

This Carbon Reduction Plan forms part of the organisation's environmental objectives and applies across all regions in which the Group operates, ensuring consistent governance, monitoring and continual improvement across the full organisational boundary.

Purpose

The purpose of this Carbon Reduction Plan is to establish a structured, measurable and transparent framework for identifying, monitoring and reducing greenhouse gas emissions across the Drains Direct UK Group. The plan supports the organisation's commitment to continual environmental improvement, compliance with ISO 14001 requirements and responsible operational practices within the waste haulage and drainage sector.

This document sets out the methodologies for measuring Scope 1, Scope 2 and material Scope 3 emissions, defines the Group's carbon reduction objectives and outlines the actions required to achieve meaningful emissions reductions while recognising current technological and commercial constraints, particularly in relation to alternative fuel HGVs. The purpose is to ensure that carbon management is fully integrated into fleet operations, procurement, site management and strategic decision making, providing a clear basis for annual performance monitoring, management review and future investment planning.

Procedure Details

1. **Emissions Sources**

Scope 1: Direct Emissions
Currently measured however no duty to be reported. These includes fleet diesel, petrol and adblue consumption.

Scope 2: Indirect Energy Emissions
Measurement will begin in 2026 and includes purchased electricity for offices and depots.

Scope 3: Other Indirect Emissions

Monitoring will begin in 2026 and will focus on PPE supply chain emissions, embodied carbon in HGV procurement and other relevant upstream and downstream sources.

2. **Baseline and Measurement Methods**

Establishing the Carbon Baseline

The Group's carbon baseline will be built upon the established Scope 1 emissions data already collected through FORS compliant monitoring systems, which provide reliable, vehicle specific information on fuel consumption and associated emissions. These existing datasets form the foundation for understanding the organisation's direct environmental impact and for identifying areas where operational efficiencies can deliver reductions. From 2026 onwards, the baseline will be expanded to include Scope 2 emissions arising from purchased electricity at offices and depots, as well as selected material Scope 3 emissions, principally those associated with PPE procurement and HGV acquisition. Incorporating these additional sources will enable a more complete and accurate understanding of the Group's carbon footprint, supporting long term planning and ensuring alignment with industry expectations and future regulatory requirements. The establishment of this broader baseline will also ensure consistency, transparency and comparability year on year.

Calculation Tools

To ensure accuracy, consistency and traceability, all emissions data will be calculated using recognised and externally validated tools. The Group will use the FORS Emissions Calculator, or an equivalent approved methodology, for the assessment of Scope 1 well to wheel fleet emissions, ensuring compliance with established fleet industry standards. Scope 2 and Scope 3 emissions will be assessed using the latest BEIS and Defra emissions factors, providing an authoritative and government recognised basis for calculating energy related and supply chain emissions. Where relevant, supplier provided environmental or carbon footprint data will also be incorporated to improve precision and reduce reliance on generic assumptions. This multi source approach will ensure that all emissions reporting is robust, evidence based and suitable for both internal performance monitoring and external disclosure should legal reporting obligations arise in future.

3. Carbon Reduction Commitments

Short Term Commitments

In the short term, the Group will focus on establishing a robust and reliable emissions monitoring foundation. We will continue to maintain accurate and comprehensive Scope 1 data collection through enhanced telematics systems and VRM level fuel usage tracking, enabling meaningful analysis of fleet performance and supporting fuel efficiency improvements. Fuel usage metrics will be introduced into management key performance indicators to ensure clear accountability and behavioral change across operational teams, embedding emissions management into day to day decision making. During this period, we will also begin formalised data gathering for Scope 2 electricity consumption and priority Scope 3 categories, including PPE supply chains and HGV procurement, ensuring that the organisation is fully prepared for expanded emissions reporting from 2026 onwards.

Medium Term Commitments

Over the medium term, the Group aims to achieve demonstrable reductions in overall fuel consumption through a combination of operational efficiencies, behavioral improvements and more effective route planning. These reductions will be supported by data driven decision making, improved load consolidation and reduced unnecessary mileage. In parallel, we will introduce supplier environmental performance evaluations to ensure our procurement decisions reflect not only cost and operational capability but also the carbon impact of goods and services supplied. Working closely with key suppliers, the Group will seek to influence upstream environmental performance and increase the availability of verifiable emissions data across our supply chain, strengthening the integrity of our Scope 3 reporting.

Long Term Commitment

In the long term, the Group recognises that meaningful decarbonisation of fleet operations will require a transition to lower carbon vehicle technologies. We will therefore commit to reviewing the commercial viability, technological maturity and operational suitability of alternative fuel HGVs on an annual basis, acknowledging that heavy vehicle low carbon technologies are not yet viable for our operational requirements. As the market develops, the Group will seek opportunities to transition parts of the fleet to lower carbon options where this is operationally, technically and commercially feasible. This long-term transition will be supported by relevant infrastructure planning, supplier engagement and strategic investment aligned with the Group's broader environmental objectives.

4. Carbon Reduction Actions

Fleet and Fuel Actions

Fleet operations form the largest component of the Group's carbon footprint, and targeted action in this area is critical to achieving meaningful emissions reduction. The Group will continue to invest in advanced telematics technologies capable of capturing real time fuel consumption, idle time, harsh driving events and route efficiency, enabling focused interventions and improved operational control. Driver coaching programmes will be expanded to reinforce fuel efficient driving behaviours, including smooth acceleration, reduced idling and optimal gear selection, with performance monitored at the VRM and regional management level. Job planning and scheduling processes will also be refined to minimise unnecessary mileage, avoid duplication of journeys and maximise vehicle utilisation. Collectively, these measures will support improved fuel efficiency, reduced emissions and enhanced operational productivity across the fleet.

Operational Energy Actions

Beyond fleet activities, the Group will take proactive steps to reduce energy consumption across its offices, depots and operational sites. This will include the implementation of energy efficiency measures such as improved control of lighting and heating, the responsible use of computer equipment and machinery, and ongoing alignment with sustainability practices set out in the Sustainability and Corporate Social Responsibility Policy. Efforts will be made to reduce paper consumption through technological alternatives and to encourage responsible electricity use across all teams. The Group will also assess the potential for renewable energy solutions where practicable, evaluating opportunities for future investment that support long term emissions reduction and greater resilience against rising energy costs.

Supply Chain Actions

The Group recognises that a significant portion of its future emissions profile will relate to upstream supply chain activities and therefore commits to enhancing supplier engagement and procurement controls. Key suppliers, particularly PPE providers and vehicle manufacturers, will be required to supply sustainability information, environmental certifications or carbon footprint data to support accurate Scope 3 reporting. Embodied carbon data for all newly procured HGVs will be collected and monitored, enabling informed fleet investment decisions and a more complete understanding of lifecycle emissions. Through the application of the organisation's Sustainable Procurement and Tendering Procedure, the Group will continue to integrate environmental considerations into supplier selection, contract management and purchasing decisions, promoting higher standards across the supply chain and strengthening the integrity of its carbon reduction efforts.

5. Monitoring, Reporting and Governance

Carbon performance will be reviewed annually as part of the ISO 14001 management review, in accordance with the Environmental Policy and the defined requirements for environmental performance evaluation. Directors retain overall responsibility for ensuring that carbon reduction commitments are delivered, resourced and integrated into strategic planning. Operational monitoring will be led by the HSEQ Department, Fleet Department and the appointed Fuel Champion, who will coordinate data collection, annual emissions calculations and performance reporting across the Group.

The Group will maintain monitoring systems capable of tracking Scope 1 emissions through telematics and fleet fuel usage records, and from 2026 will incorporate Scope 2 electricity consumption and selected Scope 3 emissions. Findings will be reviewed at senior level to identify trends, assess progress against objectives and inform investment planning, procurement decisions and fleet replacement strategies.

The Group also commits to meeting all statutory reporting obligations relating to greenhouse gas emissions once legally applicable. Under the Companies (Directors' Report) and Limited Liability Partnerships (Energy and Carbon Report) Regulations 2018, commonly referred to as Streamlined Energy and Carbon Reporting (SECR), large UK companies must report their energy consumption and emissions if they meet at least two of the following criteria: more than 250 employees, turnover greater than 36 million pounds or a balance sheet total greater than 18 million pounds. Should any of the Drains Direct UK Group of companies reach these thresholds at any point in future, we will comply fully with SECR requirements, including the mandatory disclosure of energy use, Scope 1 and Scope 2 emissions, intensity metrics and a narrative on energy efficiency actions in the Directors' Report or equivalent statutory filing.

In advance of any legal obligation, the Group will continue to prepare for eventual compliance by maintaining reliable data systems, reviewing calculation methodologies and ensuring all underlying evidence is retained in accordance with good governance and audit expectations.

Responsibilities

Effective implementation of the Carbon Reduction Plan requires clear allocation of responsibilities across all levels of the organisation. The following roles hold defined duties to ensure accurate monitoring, continual improvement and the successful delivery of emissions reduction initiatives.

Board of Directors

- Provide strategic oversight and approve the Carbon Reduction Plan.
- Ensure adequate resources are allocated for emissions monitoring, data collection, fleet improvements and sustainability initiatives.
- Review organisational carbon performance annually as part of the ISO 14001 management review.
- Ensure the organisation complies with future legal reporting requirements, including Streamlined Energy and Carbon Reporting (SECR) once applicable.

Managing Directors (Group and Company Level)

- Take accountability for environmental performance within their respective companies.
- Champion carbon reduction initiatives, ensuring carbon objectives align with operational, financial and fleet planning strategies.
- Support the Fuel Champion and HSEQ team in securing operational compliance across depots and fleet activities.
- Authorise major procurement and fleet decisions with carbon considerations in mind.

HSEQ Department

- Lead the operational monitoring and reporting of Scope 1, 2 and 3 emissions.
- Maintain all environmental documented information within the Integrated Management System.
- Conduct data validation, trend analysis and prepare emissions performance reports for senior management review.
- Ensure carbon reduction actions are embedded within the Environmental Aspects and Impacts Register and wider EMS processes.
- Ensure legal compliance tracking includes energy and carbon reporting obligations.

Fuel Champion

- Oversee VRM level fuel monitoring in line with the Fuel and Emissions Policy.
- Calculate annual well to wheel emissions using the FORS Emissions Calculator or approved tools.
- Identify anomalies, inefficiencies or emerging trends in fleet fuel use and report findings to Fleet Management and HSEQ.
- Recommend targeted driver coaching or operational changes to support fuel efficiency improvements.

Fleet Department

- Implement telematics upgrades, driver performance programmes and fleet operational improvements.
- Ensure accurate fuel usage, idling data and mileage records are captured and made available for Scope 1 reporting.
- Coordinate fleet maintenance and replacement planning, integrating carbon impacts and lifecycle emissions into decision making.
- Work with suppliers to obtain emissions data for new vehicles and assess alternative fuel vehicle suitability.

Procurement and Finance Teams

- Implement sustainable procurement practices in accordance with IMS 2.20.
- Collect carbon related data from suppliers, including PPE providers and vehicle manufacturers.
- Ensure environmental and sustainability criteria are considered during tender evaluations, contract awards and supplier onboarding.
- Monitor supplier performance against environmental expectations and escalate risks where required.

Regional and Operational Managers

- Actively manage fuel related KPIs once implemented, ensuring compliance with fuel efficiency requirements.
- Promote carbon conscious decision making in daily operations, route planning and resource allocation.
- Ensure drivers and operational teams follow expectations relating to idling reduction, vehicle care and efficient driving practices.
- Raise issues or opportunities for improvement to the Fleet and HSEQ teams.

Drivers and Operational Staff

- Operate vehicles safely and efficiently, following fuel efficient driving guidance and minimising unnecessary idling.
- Accurately record fuel usage, prestart checks and mileage as required.
- Report operational or vehicle issues that may affect fuel performance or carbon emissions.
- Participate in training and awareness initiatives relating to environmental performance.

Suppliers and Contractors

- Provide emissions and sustainability data when requested, including product lifecycle information, PPE supply chain details and vehicle specification data.
- Comply with environmental requirements set out in contracts and pre qualification questionnaires.
- Support the Group’s efforts to reduce Scope 3 emissions by adopting responsible production and logistics practices.

Related Documentation and Resources

Internal IMS Documents

- IMS 1.2 Environmental Policy – Sets out the company’s environmental commitments, objectives and monitoring requirements.
- IMS 1.8 Sustainability and Corporate Social Responsibility Policy – Provides guidance on responsible resource use, workplace sustainability and staff engagement.
- IMS 1.18 Fuel, Emissions & Environment Policy – Defines fleet emissions monitoring processes, fuel efficiency expectations and the responsibilities of the Fuel Champion.
- IMS 2.20 Safe & Sustainable Procurement & Tendering Procedure – Establishes sustainability criteria for suppliers, environmental expectations and procurement controls relevant to Scope 3 emissions.
- Environmental Aspects and Impacts Register – Identifies emissions related aspects and evaluates their significance.
- Legislation Register – Includes applicable environmental and energy reporting obligations and ensures compliance monitoring.
- HSEQ Statistics – Provides operational emissions data, fuel consumption records and incident information.

External Tools and Standards

- FORS Emissions Calculator – Used for annual well to wheel emissions calculations for fleet operations.
- UK Government BEIS/Defra Emissions Factors – Provides standardised conversion factors for Scope 2 and Scope 3 emissions calculations.
- ISO 14001 Environmental Management Standard – Provides the framework for environmental planning, monitoring and continual improvement.

Legislation and Regulatory Resources

- Companies (Directors' Report) and Limited Liability Partnerships (Energy and Carbon Report) Regulations 2018 (Streamlined Energy and Carbon Reporting, SECR).
- Companies Act 2006 Section 172 – Relevant to sustainable decision making and long term stakeholder responsibilities.
- Environmental Protection Act 1990 – Overarching environmental obligations affecting waste and haulage operations.
- Climate Change Act 2008 (as amended) – Establishes the UK's national carbon reduction targets.

Suggested Review Date

12 months from last update or in light of an accident, incident or major change.

Name	Position	Date	Signature
Michelle Travers	Managing Director Drains Direct UK	09/12/2025	Michelle Travers
Brian Driver	Managing Director BioMarsh Environmental	09/12/2025	
Llyr Williams	Managing Director Wales Environmental	09/12/2025	Ll Williams