



Cabinet Office

CARBON REDUCTION PLAN GUIDANCE

Notes for Completion

Where an In-Scope Organisation has determined that the measure applies to the procurement, suppliers wishing to bid for that contract are required at the selection stage to submit a Carbon Reduction Plan which details their organisational carbon footprint and confirms their commitment to achieving Net Zero by 2050.

Carbon Reduction Plans are to be completed by the bidding supplier (1) and must meet the reporting requirements set out in supporting guidance, and include the supplier's current carbon footprint and its commitment to reducing emissions to achieve Net Zero emissions by 2050.

The CRP should be specific to the bidding entity, or, provided certain criteria are met, may cover the bidding entity and its parent organisation. In order to ensure the CRP remains relevant, a Carbon Reduction Plan covering the bidding entity and its parent organisation is only permissible where the detailed requirements of the CRP are met in full, as set out in the Technical Standard (2) and Guidance (3), and all of the following criteria are met:

- The bidding entity is wholly owned by the parent;
- The commitment to achieving net zero by 2050 for UK operations is set out in the CRP for the parent and is supported and adopted by the bidding entity, demonstrated by the inclusion in the CRP of a statement that this will apply to the bidding entity;
- The environmental measures set out are stated to be able to be applied by the bidding entity when performing the relevant contract; and
- The CRP is published on the bidding entity's website.

Bidding entities must take steps to ensure they have their own CRP as soon as reasonably practicable and should note that the ability to rely on a parent organisation's Carbon Reduction Plan may only be a temporary measure under this selection criterion.

The Carbon Reduction Plan should be updated regularly (at least annually) and published and clearly signposted on the supplier's UK website. It should be approved by a director (or equivalent senior leadership) within the supplier's organisation to demonstrate a clear commitment to emissions reduction at the highest level. Suppliers may wish to adopt the key objectives of the Carbon Reduction Plan within their strategic plans.

A template for the Carbon Reduction Plan is set out below. Please complete and publish your Carbon Reduction Plan in accordance with the reporting standard published alongside this PPN.

¹Bidding supplier or 'bidding entity' means the organisation with whom the contracting authority will enter into a contract if it is successful.

²Technical Standard can be found at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991625/PPN_0621_Technical_standard_for_the_completion_of_Carbon_Reduction_Plans_2_.pdf

³Guidance can be found at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991623/Guidance_on_adopting_and_applying_PPN_06_21___Selection_Criteria___3_.pdf

Carbon Reduction Plan Template

Supplier name: Colt Group Holdings Limited

Publication date: 18th April 2025

Commitment to achieving Net Zero

Colt Group Holdings Limited is committed to achieving Net Zero emissions by 2050.

Baseline Emissions Footprint

Baseline emissions are a record of the greenhouse gases that have been produced in the past and were produced prior to the introduction of any strategies to reduce emissions. Baseline emissions are the reference point against which emissions reduction can be measured.

Baseline Year: 2019	
Additional Details relating to the Baseline Emissions calculations	
We performed a comprehensive rebaselining exercise to accurately account for our expanded operational footprint following the acquisition of Lumen EMEA. As such, data for the 2019-2024 period includes Lumen EMEA.	
EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	6,773
Scope 2	43,841 (market-based methodology)
Scope 3 (Included sources)	495,494
Total Emissions	546,108

Current Emissions Reporting

Reporting Year: 2024	
EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	3,881
Scope 2	6,941 (market-based methodology)
Scope 3 (Included sources)	341,814
Total Emissions	352,635

Emissions reduction targets

In order to continue our progress to achieving Net Zero, we have adopted the following carbon reduction targets:

We have set comprehensive, near-term and long-term emissions reduction targets approved by the Science-Based Targets Initiative (SBTi).

Colt Group commits to reach net-zero GHG emissions by 2045. This means reducing absolute Scope 1, 2 and 3 GHG emissions by 90% by 2045, from a 2019 base year.

Our 2030 aims are:

Scope 1 and Scope 2: A carbon reduction of 47% by 2030 (relative to a 2019 baseline) to meet the ambitious target of limiting temperatures to 1.5 degrees

Scope 3: Colt Group is aligning with the Paris Agreement well-below 2 degrees trajectory. We will cut emissions by 28% (compared to our 2019 baseline). Our Scope 3 emissions in 2024 made up 97% of our overall emissions. Since 2019, we have reduced our Scope 3 emissions by 31%.

Following the GHG Protocol best practices and Colt Group's rebaseline policy, we performed a comprehensive rebaselining exercise to accurately account for our expanded operational footprint due to the acquisition of Lumen EMEA.

In 2025, we have engaged with the SBTi to communicate the increase in our emissions following the acquisition and to ensure that our SBTs hereafter will be reflective of our current operation and structural changes.

Carbon Reduction Projects

Completed Carbon Reduction Initiatives

The following environmental management measures and projects have been completed or implemented since the 2019 baseline.

Greening our Vehicles

At Colt Group, we are working to decarbonise our in-house fleet through electrification with a commitment to a 75% pure electric fleet by 2030. Colt Group set an intermediate target of a 38% pure electric fleet by 2025, which we achieved by the end of 2024 when considering the Colt and Colt DCS fleet (excluding the Lumen EMEA fleet). When including the Lumen EMEA fleet, we ended 2024 with 30% of Battery Electric Vehicles (BEVs) and 42% Plug-in Hybrid Electric Vehicles (PHEVs).

In 2024, we added 3 additional EV charging stations across our Colt sites, for a total of 43 charging stations and 80 ports across our facilities. Additionally, at Colt DCS we have installed 29 EV charging points at five data centres across four countries.

Reduction through renewable energy

We continue to adopt energy efficient technologies to transform our network and data centres and improve our energy efficiency. Our Data Centre business' ("DCS") focus on customer experience ensures that their in house team of design and operational experts guarantee new facilities are designed with energy efficiency at the forefront. Ongoing operational expertise then seeks to continue to manage the site efficiently.

At Colt, we implement multi-year transformation programmes to leverage technological advances such as Software Defined Networking, Network Function Virtualisation, Edge Computing and Artificial Intelligence. This will result in a more intelligent network operation with IT workloads closer to the user, higher resilience and availability and reduced carbon emissions through an automated and more energy efficient system. We continue to increase the use of renewables across our operations.

We are on a journey to transition to renewable energy, with a target of 100% renewable Scope 2 electricity for all sites globally by 2030. Transitioning to renewable energy is an important element of our decarbonisation roadmap and is essential to reduce environmental harm, preserve natural resources, and support global sustainability goals.

In 2024, 97.4% of the electricity used for Colt Group's operations in the UK and Europe was sourced from renewable energy. Additionally, across Colt DCS global operations 100% of Scope 2 electricity used was renewable.

For Colt Group's global operations, we increased the proportion of renewable electricity procured covering 94% of Colt Group's total scope 2 electricity consumption. This was achieved through the procurement of Renewable Energy Certificates (RECs) and Guarantees of Origin (GOs), including those associated with Lumen EMEA.

Global Travel Policy

We have worked with our external travel advisors to develop a more sustainable approach to our global business travel needs. This involved development work on the travel booking platform to enable our employees to see the carbon emissions associated with their journey. We are committed to reducing travel by promoting video conferencing and remote meetings wherever possible, and encouraging our colleagues to choose more sustainable travel options. In 2024, we achieved a decrease of 30% in our scope 3 business travel emissions compared to 2023, driven by a significant decrease in air miles travelled. Colt set an internal cost of carbon at €13 per tonne of CO₂e to generate funding for investment in carbon removal initiatives. In 2025, we will conduct a review of the internal cost associated with corporate travel, with plans to implement cost increases. This additional funding will continue to expand our carbon reduction strategy by investing in high-quality permanent carbon dioxide removal projects.

Circular economy

We are dedicated to minimising waste generation and implementing circular economy principles wherever possible, in alignment with our Environmental, Waste and Zero Waste to Landfill policies. This is supported by our efforts through the Investment Recovery Procedure, reuse of network equipment, purchase of secondhand network equipment and donations of redundant IT and office equipment. Colt DCS currently has six sites working towards TRUE* Zero Waste certification, with plans to bring additional locations on board.

Tackling e-waste: In 2024, we continued our collaboration with Urban Miners, a metal recycling company in Sweden. We piloted this partnership in 2023, with success across Sweden and Germany. In 2024, we expanded our partnership across our European offices, including those in Spain, France, Denmark, Italy, Ireland, Germany and the UK. In 2024, we were able to recycle over 590.5 tonnes of equipment, including Synchronous Digital Hierarchy (SDH) equipment (IT hardware), a significant increase from the 8.7 tonnes recycled in 2023. This saved almost 2,200 tonnes of CO₂ and an estimated 5,600 tonnes of virgin materials.

We also partnered with 2econd Chance, a UK-based computer recycling charity, and in 2024 we donated over 400 devices for refurbishment that will be resold at discounted prices to people in need and donated to local charities.

In the future we hope to implement further measures such as:

- Achieve 100% renewable electricity procurement for all Scope 2 electricity by acquiring Renewable Energy Certificates (RECs) for all sites globally by 2030.
- Transition to more sustainable fuels for use in on-site back-up generators for data centres.
- Reduce emissions from refrigerant leakages by improving detection systems and transitioning to low global warming potential (GWP) refrigerants.
- Reduce indirect emissions by finding alternatives to travel and encouraging colleagues to choose better travel options for the environment. We have set an internal cost of carbon (€13 per tonne of CO₂e) to generate funding for investment in carbon removal initiatives.
- Decarbonise the in-house fleet through electrification and commit to a 75% pure electric fleet by 2030, with an interim target of 38% by 2025.
- Actively engage with our suppliers that represent 93% of our supply chain emissions, requesting that they align to an approved Scope 1 and 2, 1.5-degree Science Based Target by 2025.
- Engage the business to ensure ESG by Design is embedded throughout everything we do and to better understand the environmental impact of Colt's investments.
- Continue to advance the six Colt DCS sites working towards TRUE Zero Waste certification.

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 (4) and uses the appropriate Government emission conversion factors for greenhouse gas company reporting (5).

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 (6).

This Carbon Reduction Plan has been reviewed and signed off by the board of directors (or equivalent management body).

Signed on behalf of the Supplier:



Kelsey Hopkinson

Date: 18th April 2025

⁴<https://ghgprotocol.org/corporate-standard>

⁵<https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>

⁶<https://ghgprotocol.org/standards/scope-3-standard>