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.

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

[2] Technical 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

[3] Guidance 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: 26th June 2026

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	
Colt has recalculated its base year and historical emissions to reflect several updates: the transition from EEIO emission factors provided by the Carbon Trust to CEDA emission factors for Scope 3 spend-based calculations, enhancing geographical specificity; the divestment of eight Lumen EMEA data centres at the end of 2025; and the correction of the inflation rate applied within the re-baseline exercise done in 2024 due to Lumen EMEA acquisition, alongside improved data quality.	
EMISSIONS	TOTAL (tCO2e)
Scope 1	6,658.19
Scope 2 (market-based)	45,213.93
Scope 3 (Included sources)	775,983.06
Total Emissions	827,855.18

Current Emissions Reporting

Reporting Year: 2025	
EMISSIONS	TOTAL (tCO2e)
Scope 1	3,147.71
Scope 2 (market-based)	3,635.43
Scope 3 (Included sources)	486,131.19
Total Emissions	492,914.32

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 2025 made up 98.6% of our overall emissions. Since 2019, we have reduced our Scope 3 emissions by 37%.

During 2025, we advanced this commitment by enhancing Colt Group's decarbonisation roadmap to achieve our near- and long-term targets, alongside an initial assessment of the associated financial impacts. We strengthened our net-zero strategy by integrating Lumen EMEA activities and reviewing our decarbonisation roadmap, ensuring we remain on track to deliver our expected net-zero ambition. This work included identifying the strategic actions ("levers") to drive the most significant reductions in greenhouse gas emissions across our operations and value chain.

These levers were modelled across different emissions reduction scenarios to understand their potential impact over time. This approach provided significantly greater granularity than the previous analysis, enabling more accurate forecasting of future emissions and more effective tracking of progress against our reduction targets.

In addition to the modelled levers, further initiatives, such as fleet decarbonisation and circular economy and waste management, play an important role in delivering Colt Group's net-zero ambition. To support effective implementation, a governance framework is being developed that will define roles, responsibilities, decision-making processes and accountability across key functions.

Carbon Reduction Projects

Completed Carbon Reduction Initiatives

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

Decarbonisation levers

Transition to Low-carbon Fuels and Refrigerants (Scope 1)

Transition to more sustainable fuels in new sites and to replace the diesel Electrical Power Generators (once these reach their end-of life) with HVO compatible generators. In 2025 we deployed five HVO100-compliant Electrical Power Generators, with 10 more scheduled in 2026. Colt Group has set a commitment to upgrade end-of-life refrigeration systems to use low-GWP refrigerants. In 2025, we installed a new 450 kW chiller at the Nanterre Node (Paris), replacing a previous refrigerant system operating with R134a which now uses R513a, an F-Gas with a significantly lower Global Warming Potential (around 50% less).

Decarbonise the in-house fleet (Scope 1)

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). In 2025, 31% of Colt's (incl. Lumen EMEA) owned fleet were battery electric vehicles and 51% were hybrid electric vehicles.
In 2025, including Lumen EMEA data, we reached a total of 52 charging stations and 89 ports across our sites. Additionally, at Colt DCS we have installed 31 EV charging points at six data centres across five countries.

Renewable Energy Procurement and Reduction of Electricity Consumption (Scope 2 and 3)

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 as a Service (NaaS), 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 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 2025, 95% of the electricity used for Colt Group's global operations was sourced from renewable energy. Additionally, across Colt DCS global operations 100% of Scope 2 electricity used was renewable. This was achieved through the procurement of Renewable Energy Certificates (RECs) and Guarantees of Origin (GOs).

Colt is committed to reduce Scope 2 electricity consumption in Colt technical sites and offices and deliver energy savings from synergies and optimisation projects at colocation sites. In 2025, we achieved 25% Scope 2 reduction in electricity consumption compared to 2024, representing approx. 62 GWh - mainly driven by energy efficiency practices within Colt's network and Colt DCS's data centres, grid decarbonisation and improved accuracy of sub-metered electricity data (resulting in a reallocation of electricity consumption between Colt DCS Scope 2 and Scope 3 Downstream Leased Assets). As a result of the above, Colt has estimated a 23 GWh reduction in electricity consumption through key initiatives focused on decommissioning end-of-life network infrastructure equipment.

Reduce indirect emissions from business travel (Scope 3)

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 2025, we achieved a decrease of 14% in our scope 3 business travel emissions compared to 2024, driven by a significant decrease in air miles travelled. In 2025, Colt increased the internal carbon price of €13 to €37 per tonne of CO2e to further encourage cutting of unnecessary journeys

and to reinvest the funds in verified high quality carbon removal credits representing the removal of 306 tonnes of CO_2.

Circular economy and Waste (Scope 3)

We are dedicated to minimising waste generation and implementing circular economy principles wherever possible, in alignment with our Environmental, Waste Management policies.

Embedding circularity at end of life is supported by Colt's Investment Recovery (IR) Procedure, which defines how network and IT equipment is managed when it reaches end of life. The procedure aims to ensure equipment is treated in an environmentally and financially responsible way by extending its lifecycle where possible, creating value for the business, and ensuring safe and considerate disposal.

Through the Investing Recovery Procedure, we work with a network of established asset recovery and urban mining partners to support redeployment, resale or recovery of valuable materials. These activities are enabled by coordinated processes across Procurement, Network Engineering, Supply Chain and IT, improving equipment collection, reuse and asset tracking.

Colt DCS currently has ten sites working towards TRUE Zero Waste certification, with plans to bring additional locations on board. In 2025, Welwyn Garden City achieved TRUE Gold certification, with Osaka Keihanna and Inzai 1-3 receiving TRUE Certified certification. To support this ambition, Colt DCS implemented an internal waste data management system, engaged customers to include customer-related waste data and developed site-specific action plans for each site.

Across the wider Colt Group, total waste volumes reduced by 35% compared to 2024. Of the waste generated, 62% was recycled, 27% was sent to energy recovery and only 11% went to landfill.

Tackling e-waste: In 2025, we continued our collaboration with Urban Miners within the Investment Recovery procedure in Austria, Belgium, France, Germany, Netherlands, Portugal, Spain, Sweden, Switzerland and the United Kingdom, resulting in over 290 tonnes of recycled material (with an average recycling rate of 99%), 754 tonnes of CO2 savings and over 2,480 tonnes of savings in virgin materials.

We partner with 2econd Chance, a UK-based computer recycling charity that provides hands on IT refurbishment training for people with physical disabilities, learning difficulties and social, emotional or mental health needs.

In 2025, we donated over 200 devices for refurbishment. These devices were data-wiped, refurbished, resold at discounted prices to people in-need and donated to local charities, extending their life and reducing electronic waste. 45 individuals received training using Colt donated equipment, completing 300 hours of meaningful, skills-building work. Through this donation, 43 refurbished devices were donated to schools and 2econd Chance generated £19,000 in revenue, all reinvested into the charity's programmes.

Supplier Engagement (Scope 3)

We actively engage with our suppliers to drive collective impact and decarbonise across our value chain.

In 2025, we updated our supplier engagement target to better reflect current supplier readiness, sector-specific dynamics, significant growth in our supply chain in recent years and the evolution of relevant standards. Previously, Colt Group aimed to address 93% of supply chain emissions to set SBTs by 2025; the revised target now focuses on suppliers representing 70% of supply chain

emissions to set or commit to setting SBTs by 2030.

At the end of 2025, 64% of Colt Group supply chain emissions were from suppliers that have set SBTi approved targets or aligned targets or have signed the Colt Sustainability Schedule. Through the Sustainability Schedule, we ask suppliers to develop and implement a decarbonisation plan and to set their own science-based targets for Scope 1 and 2 emissions aligned with limiting global temperature rise to 1.5°C within two years.

Supporting our suppliers on their decarbonisation journey remains a priority. In 2025, we developed a climate change guidance itinerary enabling suppliers to self-assess their maturity in climate change practices and commitments and access tailored support. We aim to publish it via Colt's Vendor Portal in 2026.

To support progress towards our SBTs, we are improving Scope 3 data quality from our suppliers by increasing supplier-specific primary data, reducing reliance on spend-based estimates and better reflecting suppliers' decarbonisation efforts in our calculations.

In 2025, we also joined the CDP Supply Chain membership, which enabled us to engage with our top 200 suppliers and request carbon footprint data. Through this process, we integrated supplier specific data from 18 suppliers, whose information met quality criteria including carbon footprint verification and geographical accuracy. We will continue to expand this coverage over time as supplier data availability increases and our engagement model matures, strengthening transparency and our understanding of value chain emissions.

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, Vice President - ESG
Date: 30/06/2026

4https://ghgprotocol.org/corporate-standard
5https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting 6https://ghgprotocol.org/standards/scope-3-standard