hcml

At the heart of recovery

CARBON REDUCTION PLAN

Our commitment to a low carbon future and a healthier planet.



MEASURE

Assess our emissions and track progress.

REDUCE

Implement actions to reduce emissions.

IMPROVE

Drive efficiency and promote innovation.

SUSTAIN

Build a resilient future for generations to come.

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Executive Statement

At HCML, improving lives and supporting recovery extends beyond the services we provide. We recognise that healthcare organisations have an important role to play in addressing climate change and reducing the environmental impacts associated with their operations.

Since establishing our carbon emissions baseline in 2022, HCML has achieved significant progress in reducing greenhouse gas emissions, reducing emissions from 658.85 tCO_2e in 2022 to 483.3 tCO_2e in 2024, representing an overall reduction of approximately 27%. This has been achieved through a combination of digitisation initiatives, flexible and hybrid working arrangements, reductions in office space, enhanced technology solutions, sustainable travel initiatives and improved operational efficiencies.

In 2025, HCML further strengthened its commitment by establishing Science Based Targets Initiative (SBTi) validated emissions reduction targets, including:

- A reduction of absolute Scope 1 and Scope 2 greenhouse gas emissions by 50.4% by 2032.
- A commitment to achieve Net Zero greenhouse gas emissions across the value chain by 2050.
- While meaningful progress has already been achieved, HCML recognises that the majority of its emissions arise from Scope 3 activities, particularly employee commuting, homeworking, business travel and purchased goods and services. These areas represent the greatest opportunities for further emissions reductions and therefore form the primary focus of this Carbon Reduction Plan.

This Plan sets out HCML's baseline emissions, reduction targets, governance arrangements and key initiatives for managing carbon emissions. Delivery of the Plan will be overseen through established governance structures including the Executive Committee, Operating Board, Quality Committee and Sustainability Working Group, ensuring carbon reduction activities remain aligned with organisational strategy and operational priorities.

We are committed to measuring our performance transparently, reporting progress annually and continually improving our approach as new technologies, opportunities and best practices emerge.

Through collective action and responsible leadership, HCML will continue to reduce its environmental impact while supporting healthier people, healthier communities and a more sustainable future.

Approved by:

James Murray
Chief Executive Officer

Marc Holl
Chief Quality Officer

1. Our Commitment

Sustainability is an important part of HCML's commitment to responsible business practice. We recognise that our activities have an environmental impact and that organisations have an important role to play in supporting the UK's transition to a lower-carbon economy.

Our ambition is not simply to measure emissions, but to actively reduce them through practical and achievable actions that are integrated into the way we operate. We are committed to embedding sustainability into decision-making processes, strengthening accountability and continually improving our environmental performance.

To support this ambition, HCML will continue to develop its understanding of emissions across its operations and value chain, engage employees and stakeholders in carbon reduction activities, and regularly review progress against science-based targets.



2. Our Climate Ambition

HCML's approach to carbon reduction is guided by four core principles that underpin our environmental strategy and support the delivery of our science-based targets.
These principles help ensure that our approach remains evidence-based, practical and focused on continual improvement.



Measure

Understanding our environmental impact is the foundation of meaningful climate action.
HCML will continue to undertake annual corporate carbon footprint assessments to understand where emissions occur across our operations and value chain. Carbon reporting provides the evidence needed to identify emissions hotspots, prioritise actions and measure progress against our science-based targets.
By maintaining a robust and consistent approach to carbon measurement, we can track performance over time and make informed decisions about future reduction opportunities.

Reduce

Carbon reduction remains the central objective of this Plan.
HCML will focus its efforts on the most significant sources of emissions identified through annual carbon footprint reporting and organisational reviews. Particular attention will be given to the emissions sources that represent the greatest opportunity for meaningful reductions, including business travel, employee commuting and wider Scope 3 emissions.
Our aim is to implement practical and proportionate actions that can deliver measurable environmental benefits whilst continuing to support operational effectiveness and service delivery.

Improve

Carbon reduction is an ongoing journey rather than a fixed destination.
HCML is committed to reviewing performance regularly, monitoring emerging risks and opportunities and continually improving its approach to carbon management. As our understanding of emissions develops and reporting maturity increases, we will continue to strengthen this Plan, improve data quality and identify new opportunities to reduce environmental impact.
Through continual improvement, HCML will ensure that its carbon reduction activities remain aligned with organisational objectives, stakeholder expectations and long-term net-zero ambitions.

Sustain

Achieving long-term emissions reductions requires sustainability to become part of everyday decision-making.
HCML will continue to integrate sustainability considerations into governance arrangements, procurement processes, operational activities and strategic planning. By embedding carbon reduction within existing business processes, we aim to strengthen accountability, improve ownership and ensure environmental considerations are incorporated into organisational decision-making.

3. Our Science-Based Targets

HCML has established science-based greenhouse gas emissions reduction targets using 2022 as its baseline year.

Validated by the SBTi, these targets ensure that our approach to carbon reduction is aligned with climate science and supports global efforts to limit the impacts of climate change.

Near-Term Target (2032)

Reduce absolute Scope 1 and Scope 2 greenhouse gas emissions by 50.4% from the 2022 baseline, by 2032.

Long-Term Target (2050)

Achieve net-zero greenhouse gas emissions across HCML's value chain by 2050, using 2022 as the baseline year for measuring progress.

These targets provide the strategic direction for our carbon reduction activities and underpin our long-term commitment to achieving a lower-carbon and more sustainable future.

4. Scope and Organisational Boundary

HCML's carbon footprint assessment and Carbon Reduction Plan are based on an operational control approach, whereby emissions arising from activities under HCML's operational control are included within organisational reporting. The organisational boundary applied within this Plan is consistent with that used for HCML's annual carbon footprint assessments and greenhouse gas reporting. The assessment covers Scope 1 and Scope 2 emissions together with relevant Scope 3 categories across the value chain. A consistent organisational boundary is applied for annual carbon footprint reporting, performance monitoring and tracking progress against HCML's SBTi commitments, ensuring transparency, consistency and comparability over time.

SCIENCE BASED TARGETS

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

5. Our Carbon Baseline

HCML uses 2022 as its baseline year for carbon management, target-setting and performance measurement.

Annual carbon footprint reporting provides a consistent framework for understanding emissions, identifying trends and monitoring progress against our science-based targets over time. The baseline year serves as the reference point against which future emissions reductions will be measured.

A summary of HCML's baseline emissions is provided below:

Emissions Category	2022 Baseline (tCO_2e)
Scope 1	6.43
Scope 2	64.27
Scope 3	588.15
Total	658.85

The majority of HCML's baseline emissions were associated with Scope 3 activities, reinforcing the importance of addressing emissions across our value chain alongside reductions within our direct operations.

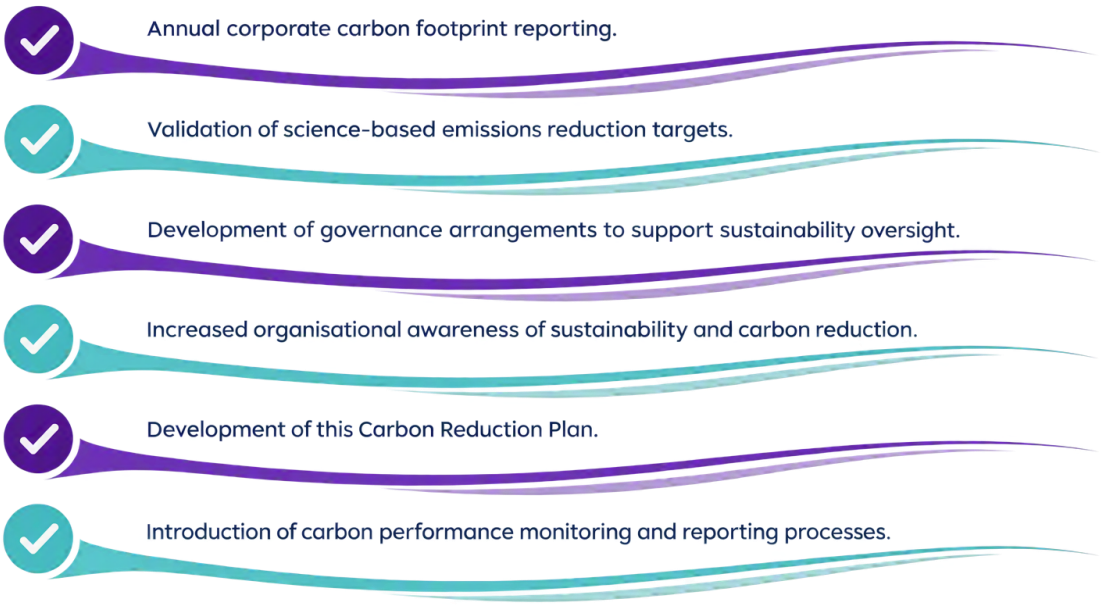
Carbon footprint reporting is undertaken annually using recognised greenhouse gas accounting methodologies, enabling HCML to track progress, evaluate performance and identify opportunities for continual improvement.

6. Progress Since Our Baseline Year

Since establishing its 2022 carbon baseline, HCML has continued to strengthen its approach to environmental sustainability and carbon management whilst delivering a reduction in reported greenhouse gas emissions.

Total emissions decreased from 658.85 tCO_2e in 2022 to 546.65 tCO_2e in 2023 and 483.3 tCO_2e in 2024, representing an overall reduction of approximately 27% against the baseline year. Whilst annual emissions may fluctuate due to operational and reporting factors, this trend demonstrates positive progress towards HCML's SBTi commitments.

Key achievements include:



These activities have established a strong foundation for long-term carbon reduction and continual improvement.

7. Understanding Our Emissions

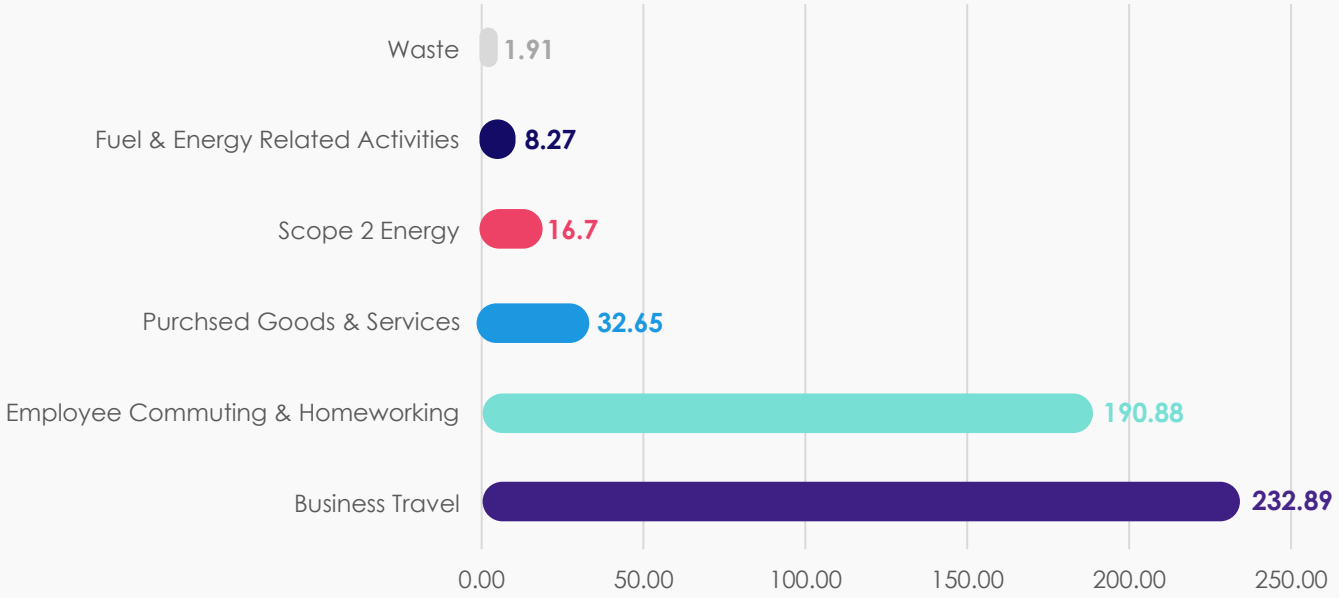
The 2024 Corporate Carbon Footprint identified total emissions of 483.3 tCO_2e, with approximately 97% arising from indirect Scope 3 sources. Analysis of the results demonstrates that Business Travel and Employee Commuting and Homeworking are HCML's most significant emissions hotspots and therefore represent the greatest opportunities for meaningful emissions reduction.

The below table summarises HCML's 2024 emissions profile by category and identifies the principal sources of organisational emissions.

Emissions Source	Share of 2024 Footprint	Executive Interpretation
Business Travel	Approximately 48%	Largest emissions hotspot and the priority area for targeted reduction activity.
Employee Commuting and Homeworking	Approximately 39%	Second largest hotspot, requiring sustained focus on smarter working and lower-carbon commuting choices.
Other Scope 3 Sources	Approximately 10%	Includes wider value-chain activity where supplier engagement and improved data quality will support future reductions.
Scope 1 and Scope 2	Approximately 3%	Relatively small proportion of total footprint but remains central to the validated near-term SBTi target.

Source: HCML 2024 Corporate Carbon Footprint. Percentages are rounded and presented to support executive interpretation of the principal emissions hotspots.

HCML 2024 Emissions Profile (483.3 tCO_2e)



The emissions profile highlights that Business Travel and Employee Commuting & Homeworking together account for almost 88% of HCML's total carbon footprint. This demonstrates that achieving HCML's science-based targets and long-term net-zero ambition will depend heavily on reducing travel-related emissions, influencing behaviours and supporting sustainable ways of working.

Consequently, Sustainable Business Travel and Employee Commuting and Smarter Working have been identified as the organisation's primary carbon reduction focus areas. These will be supported by initiatives relating to sustainable procurement, improved carbon data and reporting, stakeholder engagement and the continued integration of sustainability into business decision-making processes.

8. Carbon Risks and Opportunities

Climate change presents both risks and opportunities for HCML.

Potential risks include increased regulatory expectations, changing client requirements, rising operating costs, supply chain disruption and reputational impacts associated with environmental performance.

At the same time, climate action creates opportunities to improve operational efficiency, strengthen stakeholder confidence, support responsible business practices and enhance organisational resilience.

By taking a structured approach to carbon management, HCML aims to minimise risk while creating long-term value through improved sustainability performance.



9. Governance and Accountability

Achieving meaningful carbon reductions requires strong governance and clear accountability.

Rather than creating separate sustainability governance structures, HCML has chosen to embed carbon reduction within existing governance arrangements to support integration into day-to-day business operations and decision-making.

Accountability is structured so that executive and committee groups provide oversight and challenge, while named functional leads and the Sustainability Working Group are responsible for coordinating delivery, monitoring progress and escalating risks or barriers through the governance framework.

Executive Committee
Responsible for:
Strategic oversight of sustainability commitments.
Review of progress against science-based targets.
Approval of significant sustainability initiatives and investment decisions.

Quality Committee
Responsible for:
- Monitoring implementation progress.
- Reviewing carbon performance and emerging risks.
- Escalating significant issues to the Executive Committee where required.
- Monitoring delivery of this Carbon Reduction Plan.
- Reviewing KPI performance and progress updates.
- Supporting continual improvement and accountability.

Quality & Compliance Coordinator
Responsible for:
- Annual carbon footprint reporting.
- Progress monitoring against SBTi commitments.
- Coordination of reporting and improvement activities.

Departmental Leads
Responsible for:
- Supporting implementation of relevant actions.
- Embedding sustainability considerations into operational decision-making.
- Contributing to reporting and performance reviews.

10. Carbon Reduction Roadmap

HCML recognises that achieving its science-based targets and long-term net-zero ambition will require a phased and structured approach. The Carbon Reduction Roadmap provides a framework for prioritising activities, monitoring progress and embedding sustainability within the organisation over time.

2026 - 2027	2028 - 2030	2031 - 2032	2033 - 2050
Foundation & Implementation	**Integration & Improvement**	**Near-Term Target Achievement**	**Net-Zero Transition**
▪ Governance Framework ▪ KPI Monitoring ▪ Sustainability working group ▪ Travel & commuting review	▪ Review travel emissions ▪ Strengthen supplier engagement ▪ Improve carbon data quality	▪ Review SBTi progress ▪ Address reduction gaps ▪ Refresh strategy	▪ Carbon value-chain reductions ▪ Emerging Technologies ▪ Long term net-zero delivery
Strategic Focus	**Strategic Focus**	**Strategic Focus**	**Strategic Focus**
Embed governance, establish KPI reporting, assign owners and begin targeted action on travel and commuting emissions.	Integrate sustainability into operations, strengthen supplier engagement and improve emissions data quality.	Review progress against SBTi targets, close residual reduction gaps and refresh the next stage of the strategy.	Continue value-chain emissions reduction, respond to emerging opportunities and periodically refresh priorities.
Executive Outcome	**Executive Outcome**	**Executive Outcome**	**Executive Outcome**
Carbon reduction governance is operational, and priority actions are mobilised.	Carbon reduction becomes embedded in business planning, procurement and operational decision-making.	HCML is positioned to meet its near-term reduction pathway and approve the next roadmap.	Carbon reduction remains embedded as HCML progresses towards net-zero emissions by 2050.

Source: HCML Carbon Reduction Roadmap. The roadmap summarises the phased delivery approach from implementation through to net-zero transition.

10.1. Phase 1 – Foundation & Implementation (2026-2027)

Focus:

- Embed governance, accountability and carbon performance monitoring.
- Implement the Carbon Reduction Plan.
- Improve organisational awareness of carbon reduction.
- Begin targeted action on business travel and employee commuting emissions.

Key Activities:

- Launch carbon reduction governance framework.
- Introduce KPI monitoring and reporting.
- Establish a cross-functional Sustainability Working Group.
- Deliver organisation-wide sustainability awareness activities.
- Review business travel patterns and identify opportunities to reduce avoidable journeys.
- Improve understanding of employee commuting and homeworking emissions.
- Begin supplier sustainability engagement programme.
- Establish annual Carbon Reduction Plan review process.
- Assign named accountable owners and target completion dates for each priority action by the end of 2026.

Expected Outcomes:

- Governance structure operational.
- KPI reporting established.
- Sustainability Working Group established.
- Annual Carbon Reduction Plan review completed.
- Baseline travel and commuting reduction opportunities identified.
- Supplier engagement programme launched.

10.2. Phase 2: Integration and Improvement (2028-2030)

Focus:

- Integrate sustainability into operational activities.
- Reduce travel-related emissions.
- Improve supplier engagement and Scope 3 management.
- Increase employee participation and ownership.
- Improve carbon data quality and reporting.

Key Activities:

- Expand supplier sustainability assessments.
- Improve supplier emissions data collection.
- Strengthen sustainable procurement practices.
- Expand sustainability awareness initiatives.
- Implement travel reduction measures where appropriate.
- Promote lower-carbon commuting options.
- Improve use of primary emissions data.
- Review and refine carbon reduction initiatives annually.
- Report annual progress against agreed outcome measures, distinguishing emissions reductions from implementation activity.

Expected Outcomes:

- Reduction in business travel emissions.
- Increased employee participation in sustainability initiatives.
- Annual supplier sustainability reviews completed.
- Increased supplier sustainability data coverage.
- Improved quality and completeness of carbon reporting.
- Greater integration of sustainability considerations within business decision-making.

10.3. Phase 3 – Near-Term Target Achievement

Focus:

- Review performance against SBTi near-term commitments.
- Evaluate effectiveness of carbon reduction initiatives.
- Address remaining emissions reduction gaps.
- Refresh strategy for the next stage of the journey.

Key Activities:

- Complete detailed review of progress against science-based targets.
- Review emissions trends across all material categories.
- Identify areas where additional reductions are required.
- Update reduction priorities based on organisational needs and emerging best practice.
- Confirm residual reduction gaps and agree corrective actions, owners and timescales before the 2032 near-term target deadline.
- Refresh the Carbon Reduction Plan and associated KPI Framework.

Expected Outcomes:

- Progress aligned with the SBTi reduction pathway.
- Emissions reduction trajectory maintained.
- Updated Carbon Reduction Plan approved.
- Clear roadmap established for the next phase of emissions reduction

10.4. Net-Zero Transition

Focus:

- Continue reducing emissions across operations and the value chain.
- Maintain alignment with science-based targets and net-zero commitments.
- Respond to emerging technologies, opportunities and stakeholder expectations.

Key Activities:

- Continue reducing Business Travel and Employee Commuting emissions.
- Strengthen supplier sustainability engagement and procurement requirements.
- Review opportunities presented by emerging technologies and innovations.
- Improve visibility of value-chain emissions.
- Refresh carbon reduction priorities periodically to reflect best practice and organisational needs.

Expected Outcomes:

- Continued progress towards net-zero emissions.
- Ongoing improvement in sustainability performance.
- Regular strategic reviews completed.
- Carbon reduction remains embedded within governance and decision-making processes.

11. Carbon Reduction Focus Areas

HCML have produced a plan to reduce our carbon across 3 focus areas detailed in 11.1, 11.2 and 11.3.

11.1 Sustainable Procurement & Supplier Engagement	
Why This Matters	• Although Purchased Goods and Services currently represent a smaller proportion of HCML's measured emissions than travel-related categories, procurement remains an important Scope 3 emissions source and is expected to become increasingly significant as the organisation's understanding of value-chain emissions and carbon reporting maturity develops. • Many environmental impacts occur across the wider value chain and sit outside HCML's direct operational control. Improving supplier engagement, transparency and sustainability performance will therefore play an important role in supporting long-term carbon reduction objectives. • By working collaboratively with suppliers, HCML can encourage more sustainable practices, improve the availability of environmental information and strengthen understanding of emissions across the supply chain.
Our Commitments	We will: • Engage strategic suppliers on sustainability performance and carbon reduction. • Encourage suppliers to develop environmental and carbon reduction commitments. • Consider sustainability criteria within procurement and supplier review processes. • Improve the quality and availability of supplier sustainability information. • Incorporate sustainability considerations into supplier selection and contract review activities. • Conduct periodic sustainability reviews with key suppliers. • Improve visibility of emissions and environmental impacts across the supply chain.
Success Measures	Progress will be measured through: • Annual engagement with strategic suppliers. • Completion of supplier sustainability reviews. • Increased availability of supplier sustainability information. • Improved understanding of supplier emissions and environmental impacts. • Greater integration of sustainability considerations within procurement decisions.
Ownership	**Lead:** Supplier Management **Support:** Quality & Compliance Coordinator, Finance **Reporting:** Quality Committee → Executive Committee

11.2 Sustainable Business Travel	
Why This Matters	• Business Travel currently represents HCML's largest source of greenhouse gas emissions, accounting for approximately 48% of the organisation's total carbon footprint. The majority of these emissions arise from travel undertaken using private and rental vehicles. • Whilst travel remains essential for service delivery, stakeholder engagement and operational effectiveness, HCML recognises that reducing avoidable travel presents one of the most significant opportunities to lower emissions and support delivery of our SBTi commitments. • Our objective is not to eliminate travel, but to ensure travel decisions appropriately balance operational requirements with environmental responsibility.
Our Commitments	We will: • Promote a virtual-first approach wherever appropriate. • Encourage greater use of digital collaboration and communication technologies. • Consider environmental impacts when planning business travel activities. • Review travel patterns regularly to identify opportunities for reducing emissions. • Promote awareness of lower-carbon travel options. • Continue monitoring travel-related emissions through annual carbon footprint assessments. • Support managers in making informed and sustainable travel decisions.
Success Measures	Progress will be measured through: • Annual reduction in business travel emissions. • Increased use of virtual meeting technologies where appropriate. • Regular review and analysis of business travel trends. • Improved awareness of travel-related carbon impacts across the organisation. • Demonstrable consideration of sustainable travel options when planning journeys.
Ownership	**Lead:** Department Managers **Support:** Quality & Compliance Coordinator, Human Resources **Reporting:** Quality Committee → Executive Committee

11.3 Employee Commuting & Smarter Working	
Why This Matters	• Employee commuting and homeworking account for approximately 39% of HCML's carbon footprint, making this the second largest emissions source within the organisation. • HCML recognises that commuting choices are influenced by factors including employee location, operational requirements, public transport availability and flexible working arrangements. Whilst many of these factors remain outside direct organisational control, encouraging lower-carbon travel choices can contribute significantly to reducing emissions. • By supporting smarter working practices and promoting sustainable travel behaviours, HCML can reduce commuting-related emissions whilst maintaining employee wellbeing, engagement and operational effectiveness.
Our Commitments	We will: • Continue to support hybrid and flexible working arrangements where operationally appropriate. • Improve understanding of employee commuting patterns through future carbon footprint assessments. • Encourage consideration of active travel options where practical. • Promote awareness of public transport and car-sharing opportunities. • Engage employees on the environmental impacts of travel behaviours. • Explore opportunities to support lower-carbon commuting choices across the workforce.
Success Measures	Progress will be measured through: • Improved understanding of employee commuting emissions. • Continued adoption of hybrid and flexible working arrangements. • Increased awareness of lower-carbon commuting options. • Employee engagement activities focused on sustainable travel. • Annual reduction in commuting-related emissions where practical and achievable.
Ownership	**Lead:** Human Resources **Support:** Quality & Compliance Coordinator, Department Managers **Reporting:** Quality Committee → Executive Committee

12. Stakeholder Engagement and Sustainability Culture

Successful delivery of HCML's Carbon Reduction Plan relies on employee engagement, effective collaboration and a culture that supports sustainability across the organisation and wider value chain.

Whilst HCML's primary carbon reduction opportunities are focused on business travel, employee commuting and procurement activities, achieving meaningful and lasting reductions requires employees, managers, suppliers and leadership teams to work together to embed sustainability into everyday decision-making. HCML will continue to engage employees through awareness activities, communications and opportunities to participate in sustainability initiatives. Progress against carbon reduction objectives and SBTi commitments will be communicated through existing governance structures to maintain visibility, accountability and organisational ownership.

Sustainability Working Group

To support delivery of the Carbon Reduction Plan and HCML's wider sustainability objectives, a cross-functional Sustainability Working Group will be established.



The purpose of the Working Group is to provide oversight, coordination and collaboration across the organisation, helping to ensure that sustainability considerations are embedded into business activities and decision-making. The Group will act as a forum for sharing ideas, monitoring progress and identifying opportunities for continual improvement.

The Sustainability Working Group will:

- Include representatives from key business functions.
- Meet at least quarterly to review progress against the Carbon Reduction Plan.
- Monitor the implementation of carbon reduction actions and initiatives.
- Identify opportunities to reduce emissions and improve environmental performance.
- Share knowledge, best practice and lessons learned across departments.
- Support employee awareness and engagement activities.
- Review emerging sustainability requirements, risks and opportunities.
- Escalate significant issues, recommendations and progress updates through HCML's governance structure.



By bringing together colleagues from across the organisation, the Working Group will help strengthen accountability, encourage collaboration and support HCML's long-term commitment to carbon reduction and continual improvement.

13. Performance Measurement and KPI Framework

HCML is committed to monitoring, reviewing and continuously improving its carbon reduction performance. Effective measurement is essential to understand whether actions are delivering the intended outcomes, to identify emerging risks and opportunities, and to support informed decision-making across the organisation.

Progress will be monitored using a balanced KPI framework that assesses not only carbon performance, but also the effectiveness of implementation, governance arrangements and stakeholder engagement activities. This approach recognises that successful carbon reduction depends on both achieving emissions reductions and embedding sustainability within organisational processes and culture.

Performance data will be reviewed through HCML's governance framework and used to inform action planning, resource allocation and continual improvement activities. The Carbon Reduction Plan and associated action plans will be reviewed periodically to ensure they remain aligned with organisational priorities, operational requirements and HCML's SBTi commitments.

Carbon Performance

Carbon performance indicators will measure the organisation's progress in reducing greenhouse gas emissions and achieving its long-term carbon reduction objectives.

Measures will include:

- Total greenhouse gas emissions (tCO_2e).
- Percentage reduction in emissions against the 2022 baseline year.
- Progress towards HCML's near-term SBTi target (2032).
- Progress towards HCML's net-zero target (2050).
- Annual emissions by Scope 1, Scope 2 and Scope 3 categories.
- Emissions associated with key focus areas, including business travel, employee commuting and procurement.

Delivery Performance

Delivery performance indicators will monitor implementation of the Carbon Reduction Plan and associated action plans.

Measures will include:

- Carbon reduction actions completed.
- High-priority actions delivered to schedule.
- Progress against annual sustainability objectives.
- Overdue actions reviewed and addressed.
- Carbon reduction initiatives implemented across key focus areas.
- Improvement opportunities identified and acted upon.

Governance Performance
Governance indicators will provide assurance that sustainability activities are being effectively managed, monitored and reported.

Measures will include:
- Sustainability Working Group meetings completed.
- Quarterly KPI and progress reviews completed.
- Progress reports submitted to governance groups.
- Annual Carbon Reduction Plan review completed.
- Annual carbon footprint assessment completed.
- Risks, opportunities and corrective actions reviewed through appropriate governance channels.

Engagement Performance
Engagement indicators will assess the extent to which sustainability is being communicated, understood and supported across the organisation and wider value chain.
Measures will include:
- Sustainability and carbon awareness activities delivered.
- Employee participation in sustainability initiatives.
- Departmental engagement and participation rates.
- Supplier engagement activities completed.
- Supplier sustainability reviews completed.
- Sustainability communications and awareness campaigns delivered.
- Employee feedback and improvement suggestions received.

Annual Performance Review
An annual review of performance will be undertaken following completion of HCML's carbon footprint assessment. The review will evaluate progress against the organisation's carbon reduction objectives, assess the effectiveness of initiatives delivered during the year and identify priorities for the following reporting period.
Key findings will be reported through the Quality Committee and Executive Committee to ensure continued oversight, accountability and support for HCML's carbon reduction ambitions.

14. Reporting, Transparency & Stakeholder Disclosure

HCML is committed to maintaining a transparent and credible approach to carbon management, reporting and disclosure. This Carbon Reduction Plan has been developed in alignment with recognised carbon management, reporting and governance principles and supports delivery of the organisation's validated SBTi commitments.

The Plan forms part of HCML's wider approach to sustainability, environmental management and responsible business practice. It provides a structured framework for reducing greenhouse gas emissions whilst ensuring progress is monitored, reviewed and communicated to relevant stakeholders.

HCML recognises the increasing importance of environmental transparency for clients, employees, suppliers and other stakeholders. The organisation is therefore committed to providing accurate and proportionate information regarding its carbon reduction activities, performance and progress against established targets.

Information contained within this Plan may be used to support:

- Client and tender requirements.
- Procurement and supplier due diligence activities.
- Annual sustainability and ESG reporting.
- SBTi reporting requirements.
- EcoVadis and other sustainability assessments.
- Governance and performance reporting.
- Stakeholder requests relating to environmental performance and carbon reduction activities.
- Internal business planning and continual improvement activities.

This Plan complements HCML's annual carbon footprint assessment, KPI monitoring and sustainability governance processes. Together, these mechanisms provide a framework for measuring performance, monitoring progress, identifying opportunities for improvement and demonstrating progress towards the organisation's near-term (2032) and net-zero (2050) emissions reduction commitments.

Progress against this Plan will be reviewed through HCML's established governance structure, including the Sustainability Working Group, Quality Committee, Operating Board and Executive Committee. Findings will be used to inform future priorities, support continual improvement and ensure the Plan remains aligned with organisational objectives, stakeholder expectations and evolving best practice.

Through regular reporting, transparent disclosure and effective governance, HCML aims to demonstrate accountability for its carbon reduction commitments and maintain stakeholder confidence in its sustainability journey.

15. Monitoring, Review & Oversight

HCML is committed to ensuring that progress against this Carbon Reduction Plan is monitored, reviewed and managed through established governance arrangements. Regular review activities will provide assurance that carbon reduction objectives remain on track, actions are delivered effectively and emerging risks and opportunities are identified in a timely manner.

Monitoring and review activities will support continual improvement, inform decision-making and help ensure the Plan remains aligned with organisational priorities, operational requirements and HCML's SBTi commitments.

Quarterly

The following activities will be undertaken on a quarterly basis:

- Review of carbon reduction KPIs and performance indicators.
- Monitoring of progress against carbon reduction actions and initiatives.
- Review of sustainability-related risks, issues and opportunities.
- Reporting of progress through the Quality Committee.
- Review of Sustainability Working Group activities and action updates, where applicable.

Annually

The following activities will be undertaken annually:

- Completion of HCML's corporate carbon footprint assessment.
- Review and update of the Carbon Reduction Plan.
- Assessment of progress against carbon reduction objectives and targets.
- Review of supplier sustainability engagement activities and performance.
- Evaluation of carbon reduction initiatives delivered during the reporting period.
- Reporting of annual progress to the Executive Committee.

Periodic Strategic Reviews

In addition to routine monitoring activities, HCML will undertake periodic strategic reviews to ensure continued alignment with long-term sustainability objectives and external requirements.

- These reviews may include:
- Assessment of progress towards near-term (2032) and net-zero (2050) SBTi targets.
- Review of emerging sustainability risks, opportunities and regulatory developments.
- Evaluation of emissions trends and carbon reduction performance.
- Refresh of carbon reduction priorities and action plans.
- Consideration of new technologies, data sources and best practices that may support further emissions reductions.

Governance

Progress against this Plan will be reviewed through HCML's governance framework, including the Sustainability Working Group, Quality Committee, Operating Board and Executive Committee as appropriate. Findings from monitoring and review activities will be used to drive continual improvement and support delivery of HCML's long-term carbon reduction commitments.

16. Continual Improvement

HCML recognises that carbon reduction is a continual journey rather than a fixed destination. As the organisation's understanding of its emissions profile develops, and as new technologies, data sources and industry best practices emerge, HCML will continue to strengthen its approach to carbon management and identify new opportunities to reduce environmental impact.

The organisation is committed to embedding sustainability within its decision-making processes and maintaining a culture of continual improvement. Lessons learned through implementation of this Plan, stakeholder engagement activities, carbon footprint assessments and performance reviews will be used to inform future priorities and actions.

This Carbon Reduction Plan will be reviewed annually to ensure continued alignment with:

- HCML's SBTi commitments.
- Organisational priorities and business objectives.
- Regulatory and reporting requirements.
- Industry best practice and emerging standards.
- Stakeholder expectations.
- Long-term net-zero ambitions.

As HCML's carbon reduction programme matures, the organisation may evaluate the potential role of high-quality carbon credits, carbon removal solutions and other recognised climate mitigation mechanisms as part of its longer-term net-zero strategy. Any future use of such mechanisms would be considered only after prioritising direct emissions reductions and would be subject to appropriate governance, due diligence and alignment with recognised best practice.

Through regular review, effective governance and ongoing engagement with employees, suppliers and other stakeholders, HCML will continue to strengthen its carbon reduction programme and support delivery of its near-term (2032) and net-zero (2050) emissions reduction targets.

Reporting Period Statement

This Carbon Reduction Plan is based upon HCML Ltd's most recent verified organisational carbon footprint for the reporting year ending 31 December 2024.

At the date of publication of this Carbon Reduction Plan (September 2026), the organisation's 2025 carbon footprint assessment had not yet been completed, verified and approved. Consequently, 2024 emissions data represents the most recent complete and approved dataset available for reporting purposes.

HCML undertakes annual corporate carbon footprint assessments and will update this Carbon Reduction Plan upon completion and approval of the 2025 assessment. The organisation remains committed to annual monitoring and reporting of greenhouse gas emissions and progress towards its Science Based Targets initiative (SBTi) near-term targets and Net Zero commitment.

Declaration and Sign Off

This Carbon Reduction Plan has been completed in accordance with PPN 006 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 use 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.

HCML Ltd is committed to achieving Net Zero greenhouse gas emissions across its value chain by 2050.

This Carbon Reduction Plan has been reviewed and approved by the HCML Executive Committee and signed off by the Chief Executive Officer on behalf of HCML Ltd.

Signed on behalf of HCML Ltd:



James Murray
Chief Executive Officer

September 2026

hcml

At the heart of recovery

HCML Ltd
Interchange
81-85 Station Road
Croydon
CR0 2RD

September 2026