KCOM

Carbon Reduction Plan

Supplier name: KCOM Group Limited

Publication date: 29/09/2025

Commitment to achieving Net Zero

KCOM group limited is a provider of broadband and copper network telephony services, as a group of companies we are committed to achieving Net Zero emissions by 2040 with a revised interim target to reduce our Scope 1&2 emissions by 80% by 2030.

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: 2022/23 (April to March)	
Additional Details relating to the Baseline Emissions calculations.	
The figures below are the baseline figures for 2022/23. The business has taken the decision to re-baseline against 2022/23, now that the full range of applicable scope 3 emissions has been reported.	
Baseline year emissions:	
EMISSIONS	**TOTAL (tCO_2e)**
Scope 1	**1,076**
Scope 2	**2,640 (Location based)** **0 (Market based)**
Scope 3 **(Included Sources)**	**Purchased goods and services – 14,395** **Capital goods – Included in purchased goods and services - 0** **Fuel and energy-related activities – 1,116**

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	Upstream transportation and distribution – Included in purchased goods and services - 0 **Waste generated in operations – Incl. in s2** **Business travel – 196** **Employee commuting – 409** **Upstream leased assets – 11** **Downstream transportation and distribution – Included in purchased goods and services – 0** **Processing of sold products – N/A** **Use of sold products – N/A** **End-of-life treatment of sold products – N/A** **Downstream leased assets – 20,221** **Franchises – N/A** **Investments – N/A**
Total Emissions	**Scope 1 & Scope 2 (location based) & 3 reported = 3,716** **Scope 1 & Scope 2 (market based) & 3 reported = 1,076** **Scope 1, 2 & 3 (location based) = 40,064** **Scope 1, 2 & 3 (market based) = 37,424**

Current Emissions Reporting

Reporting Year: 2024/25 (April to March)	
EMISSIONS	**TOTAL (tCO_2e)**
Scope 1	**779[A]** [A] Scope 1 emissions have continued to decrease y-o-y, and are now 27.6% lower than the baseline year, predominantly due to a significant reduction in travel supporting operational needs.
Scope 2	**2,523 [B] (Location based)** **2,523 [C] (Market based)** [B] Scope 2 emissions have also decreased y-o-y and are now 4.4% lower than the baseline year, again due to continued annual reduction (5% this year) in our consumption of purchased electricity. [C] An increase in market based emissions in comparison to the baseline year of 2022/23 was due to the business making the decision to end its purchase of electricity through a 100% renewables-tariff back by REGO certificates. The business shares concerns that REGO trading has not had the desired

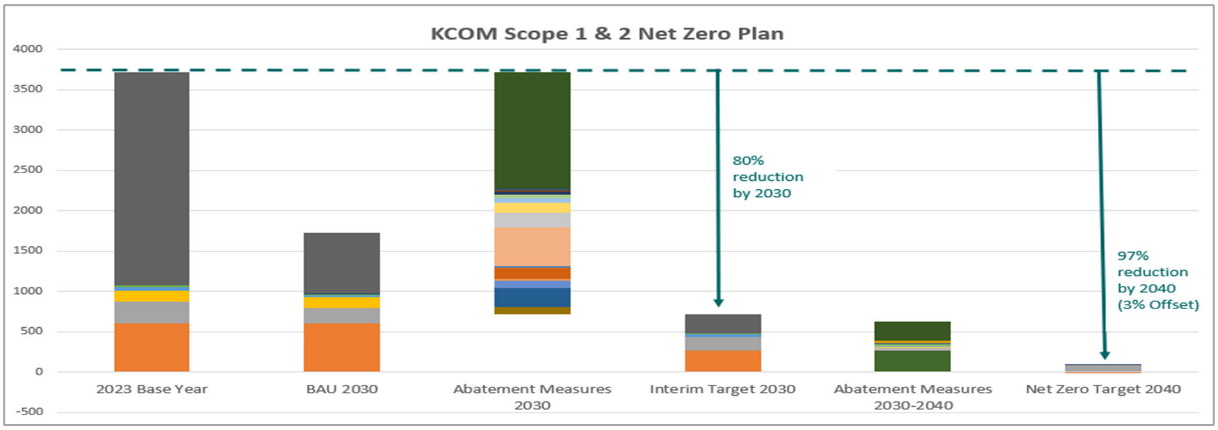
	impact of driving the development of current or additional renewable generation infrastructure. Additionally, divestment from REGOs presents opportunities for the business to divert funding to initiatives concerned with achieving energy efficiency gains and emissions reductions, over which the business has greater control.
Scope 3[D] **(Included Sources)**	**Purchased goods and services – 6,776** **Capital goods – Included in purchased goods and services - 0** **Fuel and energy-related activities – 1,008** **Upstream transportation and distribution – Included in purchased goods and services - 0** **Waste generated in operations – 2** **Business travel – 212** **Employee commuting – 423** **Upstream leased assets – 4** **Downstream transportation and distribution – Included in purchased goods and services – 0** **Processing of sold products – N/A** **Use of sold products – N/A** **End-of-life treatment of sold products – N/A** **Downstream leased assets – 17,576** **Franchises – N/A** **Investments – N/A** [D] Scope 3 emissions again decreased y-o-y and are now 28.47% lower than the baseline year mainly as result of lower emissions from reduced purchased goods and services. An environmentally extended input output (EEIO) model was used to calculate emissions from this category.
Total Emissions	**Scope 1 & Scope 2 (location based) & 3 reported = 3,302** **Scope 1 & Scope 2 (market based) & 3 reported = 3,302** **Scope 1, 2 & 3 (location based) = 29,303** **Scope 1, 2 & 3 (market based) = 29,303**

Emissions reduction targets

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

To be Net Zero by 2040 or sooner.

We project a Scope 1 & 2 (location based) 80% reduction by 2030 (equivalent to 2,973 tCO_2e by 2030) against a 2022/23 baseline year.



Carbon Reduction Projects

KCOM Group Limited is committed to reducing its greenhouse gas emissions. Initiatives completed include:

- Continuing retirement of legacy platforms and infrastructure with a view to reducing GHG emissions from electricity consumption and fugitive emissions lost during the operation of cooling equipment.
- Investment in core infrastructure support projects, replacing/upgrading legacy assets with modern technology, delivering greater levels of energy efficiency (cooling, power conversion etc.).
- Audit and monitoring of electricity consumption across business operations to improve efficient use of resources.
- Upgrades to our commercial fleet telematics systems, improving the quality of data received, and enabling the identification of opportunities to transition the fleet to electric vehicles and improve the current efficiency (driving styles etc.).
- Screening assessment completed of all Scope 3 categories to provide estimated data.

Forthcoming initiatives include:

- The continued migration of customers from our copper network to our fibre network enabling the decommissioning of legacy networks and equipment. This project, occurring over the next 36 months, is projected to yield an estimated 35-40% reduction in electricity consumption against a 2022/23 baseline year.
- The continued roll-out of our energy self-generation capability, where suitable, utilising solar generation on selected technical buildings.
- The continued evaluation of commercial electric vehicles and opportunities to enable the phased transition of our commercial vehicle fleet to electric vehicles – subject to vehicle range and the availability of charging infrastructure.
- Development of a sustainable procurement strategy and closer supplier engagement to support decarbonisation of the business' value chains (scope 3).

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[1] and uses the appropriate Government emission conversion factors for greenhouse gas company reporting[2].

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[3].

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:

Ian Shepherdson

Chief Technology and Information Officer

Date: 29th September 2025

[1] https://ghgprotocol.org/corporate-standard
[2] https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting
[3] https://ghgprotocol.org/standards/scope-3-standard