GRAHAM

PPN 006 Carbon Reduction Plan 2026



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This document outlines the Carbon Reduction Plan for John Graham Holdings Ltd (Trading as GRAHAM) in response to Public Procurement Notice (PPN 006).

Supplier name: GRAHAM

This Carbon Reduction Plan relates to John Graham Holdings Ltd (Trading as GRAHAM) and all of its subsidiaries.

Publication date: 25th September 2026

Commitment to achieving Net Zero

GRAHAM commits to achieving Net Zero greenhouse gas emissions across its value chain by FY2040—ten years ahead of the UK Government 2050 requirement.

Our commitment has been validated by the Science Based Targets Initiative and therefore aligns with the latest climate science and supports the urgent global action needed to decarbonise industry.

Our commitment to achieving Net Zero has been detailed within our **Environmental Sustainability Strategy "Constructing a Sustainable Future"**. The Strategy sets out our vision and ambition for net zero across our entire value chain and includes specific priority areas as well as short and long-term actions dedicated toward our overarching net zero ambition.

KEY PRIORITY AREAS IDENTIFIED TO SUPPORT OUR TRANSITION TO NET ZERO



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.

GRAHAM Group Baseline Year: Financial Year 2021/2022

GRAHAM uses a base year of Financial year 2021/2022 for both its long-term and near-term science based targets.

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> Credible data gives us the evidence to turn our net zero commitments into action. By understanding where our emissions arise, we can focus our efforts, demonstrate progress and deliver meaningful carbon reductions across our business.

Jayne Walker
Head of Environmental Sustainability & Protection, GRAHAM

Current Emissions Footprint

The GRAHAM emissions data contained within this CRP are aligned to the GHG Protocol's Corporate Standard and the corporate value chain (scope 3) accounting and reporting standard using the "operational control" approach. Emissions have been calculated using Department for Energy Security and Net Zero (DESNZ) Conversion Factors for company reporting of GHG emissions.

Our emissions footprint has been calculated as both "market based" and "location based". For the purposes of this CRP, we have presented the data as market based, reflective of renewable electricity supplies purchased.

All of our scope 1, 2 and partial scope 3 emissions have been certified to the requirements of Achilles Carbon Reduce. In this way we have received independent verification that we have measured our GHG emissions in accordance with ISO 14064-1:2018.

Primary activity and supplier-specific data are prioritised. Where primary information is unavailable, recognised secondary datasets, proxy data and/or extrapolation methodologies are applied. GRAHAM continues to improve data quality and increase the proportion of Scope 3 emissions calculated using activity- and supplier-specific data.

GRAHAM reviews its GHG inventory methodology annually. Material changes in methodology, organisational boundary or data quality are assessed to determine whether recalculation of historic or baseline emissions is required to preserve meaningful year-on-year comparison. Any recalculation will be transparently disclosed within future Carbon Reduction Plans.

"Downstream Transportation and Distribution" has not been included in our inventory as this category is not applicable to our operations. GRAHAM do not own or sell the infrastructure and buildings that we construct and manage.

BASELINE EMISSIONS FOOTPRINT: Yr 21/22

Scope	Emissions Source	Baseline FY21 - 22 (tCO_2e)
SCOPE 1	Gas Oil	8,927
	Company Vans	2,089
	Company Cars	213
	HVO	2
	Other (Gas, Kerosene)	142
	TOTAL SCOPE 1	**11,373**
SCOPE 2	Purchased Electricity[1]	833
	Purchased Electricity[2]	371
	TOTAL SCOPE 2 (Market Based)	**371**
SCOPE 3	*Scope 3 Subcategory Description & Applicability*	
Purchased goods and services[3]	Purchased Goods & Services	359,580
Capital goods[3]	Capital Goods	1,559
Fuel & energy related activities[3]	Electricity T&D & WTT for all Fuel	2,939
Upstream transportation	Upstream Deliveries	3,048
Waste generated in operations	Water Treatment and Supply	18
	Waste (Landfilled & not Landfilled)	538
Business travel	Employee Vehicles	1,786
	Rental cars, Flights, Trains, Hotels	1,695
Employee commuting	Employee Commuting & Home Working	6,240
Upstream leased assets[3]	Not relevant to GRAHAM operations	0
Downstream transportation[4]	Not relevant to GRAHAM operations	0
Processing of sold products[3]	Not relevant to GRAHAM operations	0
End of life treatment of products[3]	Not relevant to GRAHAM operations	0
Downstream leased assets[3]	Not relevant to GRAHAM operations	0
Franchises[3]	Not relevant to GRAHAM operations	0
Investments[3]	Not relevant to GRAHAM operations	0
	TOTAL SCOPE 3	**377,403**
TOTAL EMISSIONS (SCOPE 1,2 & 3)		**389,147**

1. Location Based – Based on grid average fuel mixes
2. Market Based – Reflective of renewable electricity supplies purchased
3. Data provided voluntarily – not mandatory as part of this Carbon Reduction Plan
4. GRAHAM do not transport or distribute downstream as part of their operations

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CURRENT EMISSIONS FOOTPRINT: Yr 25/26

Scope	Emissions Source	Emissions FY25 - 26 (tCO_2e)
SCOPE 1	Gas Oil	4,095
	Company Vans	2,067
	Company Cars	155
	HVO	36
	Other (Gas, Kerosene)	557
	TOTAL SCOPE 1	**6,910**
SCOPE 2	Purchased Electricity[1]	965
	Purchased Electricity[2]	445
	TOTAL SCOPE 2 (Market Based)	**445**
SCOPE 3	*Scope 3 Subcategory Description & Applicability*	
Purchased goods and services[3]	Purchased Goods & Services	389,187
Capital goods[3]	Capital Goods	3,267
Fuel & energy related activities[3]	Electricity T&D & WTT for all Fuel	2,456
Upstream transportation	Upstream Deliveries	6,432
Waste generated in operations	Water Treatment and Supply	14
	Waste (Landfilled & not Landfilled)	504
Business travel	Employee Vehicles	1,906
	Rental cars, Flights, Trains, Hotels	1,892
Employee commuting	Employee Commuting & Home Working	5,627
Upstream leased assets[3]	Not relevant to GRAHAM operations	0
Downstream transportation	Not relevant to GRAHAM operations	0
Processing of sold products[3]	Not relevant to GRAHAM operations	0
End of life treatment of products[3]	Not relevant to GRAHAM operations	0
Downstream leased assets[3]	Not relevant to GRAHAM operations	0
Franchises[3]	Not relevant to GRAHAM operations	0
Investments[3]	Not relevant to GRAHAM operations	0
	TOTAL SCOPE 3	**411,285**
TOTAL EMISSIONS (SCOPE 1,2 & 3)		**418,640**

1. Location Based – Based on grid average fuel mixes
2. Market Based – Reflective of renewable electricity supplies purchased
3. Data provided voluntarily – not mandatory as part of this Carbon Reduction Plan
4. Data amended from previous CRP due to updated methodology adopted for reporting of WTT for deliveries, business travel and employee commuting

Emissions Reduction Targets

GRAHAM have had its science-based greenhouse gas emissions reduction targets validated by the Science Based Targets Initiative. Our submitted targets (as detailed below) were assessed and approved against the SBTi Net-Zero Criteria and guidance. This included submission of our GHG emission sources and inventory, target setting methodologies and the emissions included in the target boundary. With the need for action growing, we believe that our targets will help drive the change needed for us to decarbonise our business.



GRAHAM SCIENCE BASED TARGETS

GRAHAM Overall Net Zero Target
GRAHAM commits to reach net-zero greenhouse gas emissions across the value chain by FY2040.

SCIENCE BASED TARGETS
DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

GRAHAM Near Term Target
GRAHAM commits to reduce absolute scope 1 and 2 GHG emissions 50% by FY2030 from FY2022 base year*. GRAHAM commits to reduce absolute scope 3 GHG emissions 40% by FY2030 from FY2022 base year.

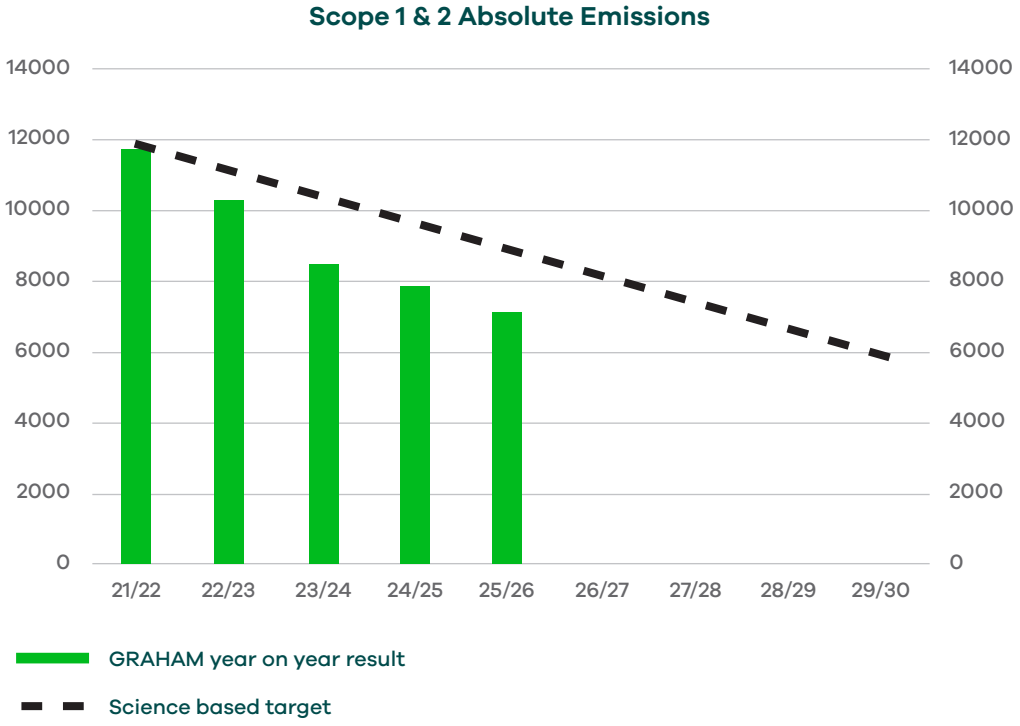
GRAHAM Long Term Target
GRAHAM commits to reduce absolute scope 1 and 2 GHG emissions 90% by FY2040 from FY2022 base year*. GRAHAM commits to reduce absolute scope 3 GHG emissions 90% by FY2040 from FY2022 base year.

**The target boundary includes land-related emissions and removals from bioenergy feedstocks.*

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Scope 1 & 2 Absolute Emissions

We project that our scope 1 and 2 carbon emissions will decrease over the next five years to 5,872 tCO_2e by 2029/2030. This represents an absolute reduction of 50% from the baseline. It is noted that this is the minimum reduction that we have set out to achieve and we are aiming to go beyond this minimum target. Additionally, we project that our scope 3 emissions will decrease over the next five years to 226,442 tCO_2e by 2029/2030. This is a reduction of 40%.



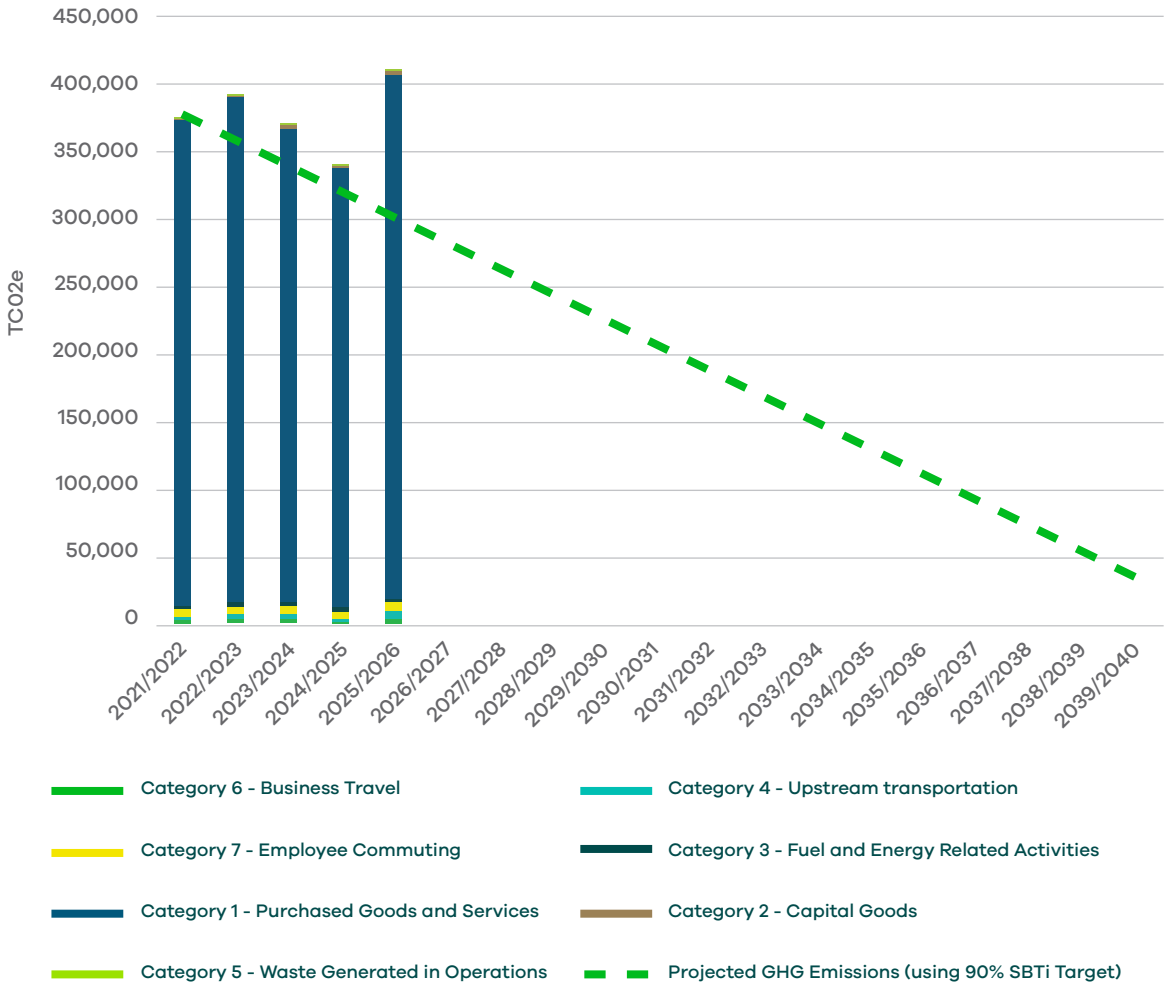
Emissions Reduction Target (cont'd)

Scope 3 Absolute Emissions
Data for scope 3 emissions spans multiple systems, millions of products and services and is notoriously difficult to unlock and quantify. We are continuing to review and refine our methodologies for measuring scope 3 data and are making good progress in transitioning away from spend based and hybrid methodologies. It is acknowledged that in the short term, data reliability issues relating to purchased goods and services are likely to cause fluctuations in results. GRAHAM is implementing a Scope 3 data-improvement programme to increase the use of transaction-level, quantity-based and supplier-specific information for purchased goods and services. Where improved methodologies result in a material change to the baseline inventory, GRAHAM will assess and disclose any baseline recalculation in accordance with its GHG inventory methodology, preserving transparency and comparability of performance.



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Scope 3 Absolute Emissions Reduction Pathway

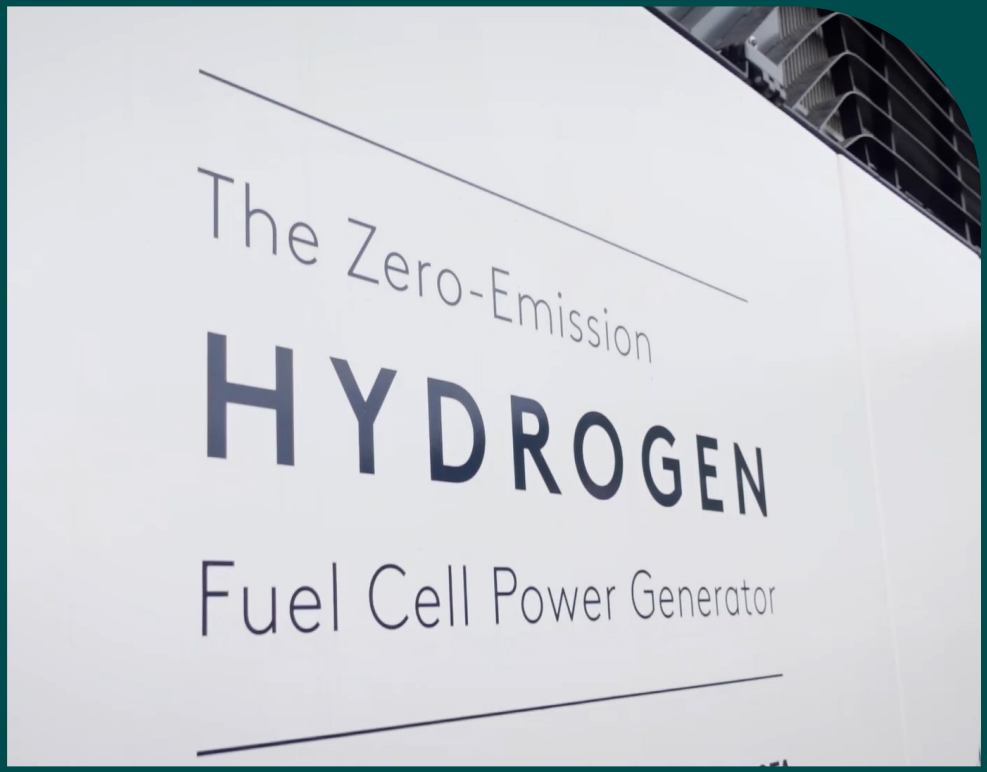


Carbon Reduction Projects

Completed Carbon Reduction Initiatives

The following environmental management measures and projects have been completed or implemented since the 2021/22 baseline. Scope 1 and 2 emissions have reduced by 4,389 tCO_2e (37%) between FY21/22 and FY25/26. The measures described below contribute to GRAHAM's emissions-reduction programme.

- Launched our revised Group wide Sustainability Strategy "Constructing a Sustainable Future", setting out our enhanced approach to how we will meet our ambitious targets.
- Achieved external verification of our carbon management system to the requirements of PAS 2080.
- Met the requirements of Achilles Carbon Reduce certification (six years running) having measured our greenhouse gas emissions in accordance with ISO 14064-1:2018 and having committed to managing and reducing our emissions in respect of the operational activities of our organisation.
- Had our targets approved as "Net Zero" by the Science based targets initiative (SBTi). In this way we used a science-based approach to ensure our targets align with requirements to ensure a 1.5oC scenario, limiting the effects on climate change.
- Business Unit carbon targets for key emission sources were set out, supported by provision of monthly carbon data. This assisted the leadership teams in reviewing progress against the targets set.
- We continue to implement our anti-idling policy, supported by telematic data to motivate machine drivers to reduce idle times where possible.
- Telemetry has been mandated for all generators and data is collated monthly and analysed in order to enhance operating efficiency, minimising fuel consumption.
- Where electrification or grid connection is not currently practicable, responsibly sourced Hydrotreated Vegetable Oil (HVO) may be used as a transitional fuel, subject to supply-chain due diligence, sustainability criteria and applicable UK Government emissions factors.
- We have officially joined ConcreteZero, a global initiative dedicated to creating a global market for net zero concrete and setting the bar for participating organisations to have transitioned to net zero concrete by 2050 at the latest, with interim targets for 2025 and 2030.
- Having worked with industry partners to develop the UK's first construction orientated Carbon Literacy Training, we are continuing to roll out this training throughout our organisation. By investing in our people's awareness of the climate emergency, we ensure that our teams understand the urgency with which we must all act.



- We worked with our energy management consultancy to procure new renewable electricity contracts for sites and offices, backed by Renewable Energy Guarantees of Origin (REGO's).
- We undertook Energy Audits across our sites and offices in order to identify carbon hotspots and opportunities for improvement.
- We worked with our fleet provider to accelerate our transition to low and zero carbon company cars. 95% of all company cars are now fully electric or plug-in hybrid (PHEV).
- We continue to develop our bespoke software system to enable the enhanced visibility of energy and carbon data arising at site level.
- During design stage (where we have design responsibility), each element of construction is reviewed to identify whether products with increased recycled content or lower embodied carbon can be used as alternatives. For example, we undertake a review to ascertain whether elements of concrete could be replaced with steel or timber alternatives or whether using cement replacements is feasible. In addition, we apply lean design through material efficiency and lean structural solutions to lower operational carbon emissions and embodied carbon impact.
- We continue to run net zero working groups to provide support and to deliver against specific objectives. The working groups assist in building case study evidence and focus our activities on areas where we can make the most substantial reductions.
- We launched Green Action Network a learning, events and communications platform designed to support our subcontractors and suppliers to achieve their own sustainability goals, whilst helping to bring about positive collaborative outcomes working together.
- GRAHAM undertakes tree planting and nature-positive initiatives as complementary environmental action. These activities are not treated as a substitute for the direct emissions reductions required to achieve our science-based targets.
- We continue to invest in new technologies in order to gain understanding of the advantages, benefits and potential barriers to low or zero carbon technologies and alternative sources of energy.
- Hybrid working policy in place, ensuring that working practices remain effective but also flexible, facilitating the reduction of carbon emissions from unnecessary travel.
- We continue to undertake energy and carbon related communication and engagement activities via our intranet site and social media channels.

GRAHAM will continue implementing targeted interventions focused on its most material emission sources.



Priorities include:

Construction energy and plant

- Progress towards zero-diesel site operations.
- Increase grid connections, electrification and battery/hybrid solutions.
- Use telemetry and energy data to target inefficient plant and generators.

Fleet

- Continue transition towards a zero-emission company fleet.
- Develop solutions for harder-to-decarbonise commercial vehicles.

Materials and supply chain

- Increase supplier-specific carbon data.
- Prioritise interventions for high-impact materials, including concrete and steel.
- Embed carbon criteria into procurement and subcontractor engagement.

Design

- Apply PAS 2080 principles and whole-life carbon thinking at key design and procurement gateways.
- Increase use of lower-carbon specifications and material-efficiency solutions.

Data

- Increase transaction-level/activity-based Scope 3 information.
- Improve supplier-specific/product-level data and EPD coverage.
- Maintain independent assurance of the corporate footprint.

People

- Continue climate and carbon competency development across relevant roles and continuing our transition to an ultra-low emissions fleet.

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 the GHG Reporting Protocol corporate standard and uses the 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 .

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

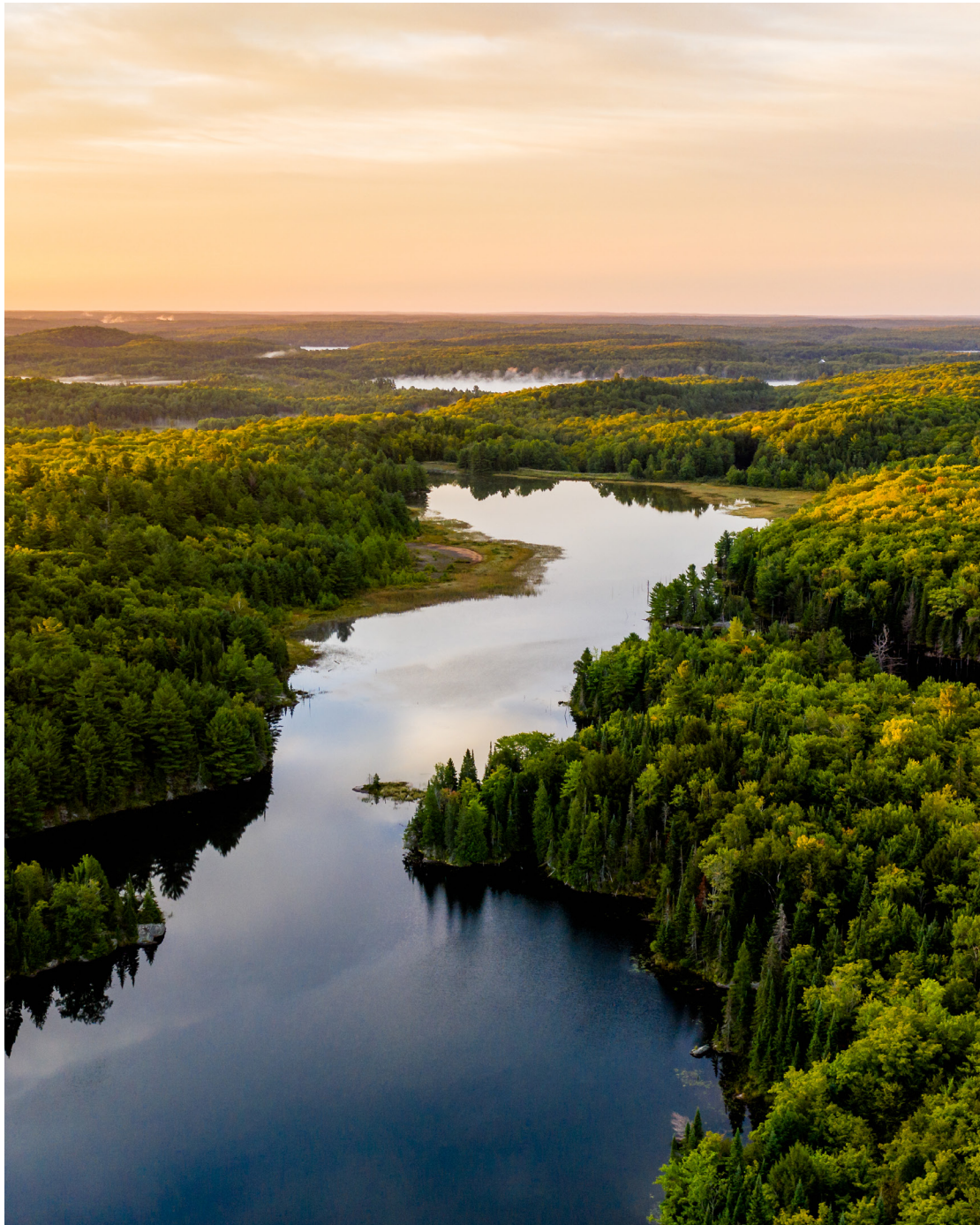
Signed on behalf of GRAHAM:

Andrew Cooke
Group Safety, Health & Environmental Sustainability Director

25th September 2026

Jayne Walker
Head of Environmental Sustainability & Protection

25th September 2026



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