



UK Carbon Reduction Plan 2025

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Version 1

This Carbon Reduction Plan has been prepared in accordance with PPN 06/21 and the associated 'Procurement Policy Note: Taking Account of Carbon Reduction Plans in the Procurement of Major Government Contracts'



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Executive Summary

Qwello UK is a Charge Point Operator (CPO) providing reliable, publicly accessible electric vehicle charging. Our infrastructure is powered exclusively by 100% REGO-certified renewable electricity, ensuring drivers charge with clean, zero-carbon energy.

We operate as part of Qwello GmbH's pan-European network, but with a local focus: embedding sustainability into our supply chain, ensuring responsible subcontractor practices, and aligned with the UK's legally binding Net Zero 2050 target, while Qwello UK is pursuing operational Net Zero by 2030.

Key highlights:

- **Team size (2024):** 6 employees, with sustainable commuting and flexible working policies.
- **Baseline year (2023):** 56.17 tCO₂e (Scope 3 only).
- **2024 footprint:** 341.23 tCO₂e (Scope 3 only), reflecting both growth and more detailed reporting.
- **Target:** Achieve operational Net Zero by 2030, ahead of the national Net Zero deadline.
- **Impact:** 36.1 tCO₂e prevented in 2024 through renewable-powered EV charging, equivalent to ~217,000 km of petrol and diesel car travel avoided.

This Carbon Reduction Plan outlines how Qwello UK will reduce emissions across its operations, supply chain, and travel, while transparently reporting progress and maximising the social value of clean mobility.

Prepared in accordance with Public Procurement Notice (PPN) 06/21 and its Technical Standard, this Plan demonstrates Qwello UK's commitment to transparent emissions reporting, continuous decarbonisation, and alignment with UK Government Net Zero objectives.



Mission Statement

At Qwello UK, we recognise that climate change is one of the defining challenges of our generation. As part of Qwello GmbH's pan-European Environmental Action Strategy, we are committed to achieving Net Zero by 2030. In the UK, we share this ambition by targeting operational Net Zero by 2030, delivering measurable reductions in our supply chain and operations while supporting the wider transition to a zero-carbon economy.

Our emissions profile is concentrated entirely in Scope 3, with Scope 1 and Scope 2 remaining at zero. This reflects our operational model: we own no vehicles or gas connections, and our entire UK charging network is powered by 100% REGO-certified renewable electricity.

We recorded a baseline footprint of 56.17 tCO₂e in 2023, increasing to 341.23 tCO₂e in 2024. This rise reflects both business growth and more comprehensive carbon accounting. The largest contributors are purchased goods, followed by business travel, employee commuting, home working, and office use.

We commit to:

Continuous

Expanding the quality and coverage of Scope 3 data, particularly in supply chain reporting and commuting patterns.

Transparency

Publishing annual sustainability reports and providing a full Climate Action Plan update by Q2 2026.

Collaboration

Working closely with suppliers, contractors, and employees to reduce upstream and downstream emissions while supporting responsible practices.

Innovation

&

Impact

Scaling the carbon prevention delivered through our charging network. In 2024 alone, our charge points supplied 154,985 kWh of renewable electricity, preventing 36.1 tCO₂e compared to petrol and diesel travel – equivalent to 217,000 km of avoided ICE mileage

Our journey towards Net Zero is rooted in delivering measurable reductions, enabling zero-carbon charging, and creating social value for the communities we serve.



Baseline Emissions

Our climate reporting shows a footprint concentrated entirely in Scope 3, with Scope 1 and Scope 2 at zero. This reflects our operational model:

- No company-owned vehicles or direct fuel use.
- No gas connections.
- All electricity used in our charging network is 100% REGO-certified renewable, resulting in zero Scope 2 emissions.

Carbon Footprint:

- 2023 (baseline): 56.17 tCO₂e
- 2024: 341.23 tCO₂e

This increase is due to both business growth and more comprehensive accounting methods, ensuring a truer reflection of our operational impact.

Key Scope 3 contributors:

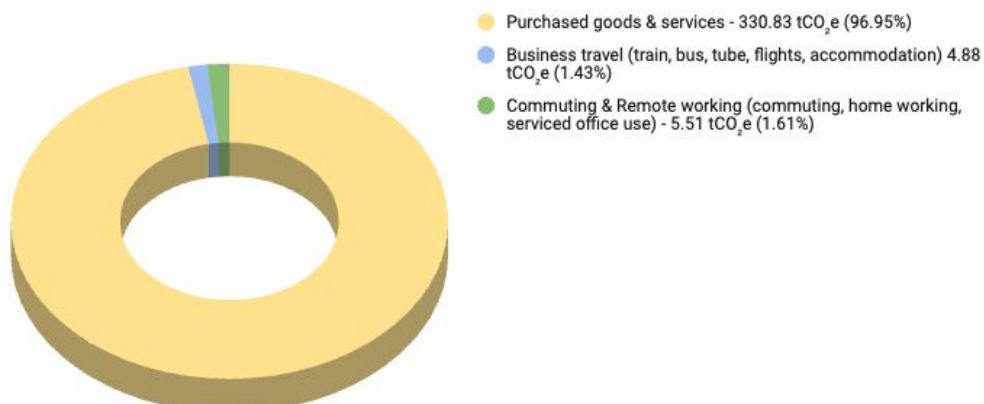
- **Capital goods:** Hardware procurement for charging infrastructure.
- **Business travel & commuting:** Staff travel, commuting patterns, and home working energy use.
- **Office space:** Emissions from our serviced office provider (WeWork).

Exclusions:

Waste and water are not included, as these are managed directly by subcontractors and our office provider, who operate under high environmental standards and provide compliance documentation.

All emissions data has been calculated in accordance with the GHG Protocol Corporate Standard and the UK Government's Environmental Reporting Guidelines (DEFRA conversion factors), as required by PPN 06/21 Technical Standard for Carbon Reduction Plans.

Scope 3 Emissions



Emissions Breakdown – 2024 (tCO₂e)

This table presents Scope 3 categories 3.2 (Capital Goods), 3.6 (Business Travel), and 3.7 (Employee Commuting & Remote Working), reported in line with the Greenhouse Gas (GHG) Protocol. It also fulfils the requirements of Public Procurement Notice (PPN) 06/21 by disclosing Scope 1, 2, and 3 emissions in accordance with the GHG Protocol framework.

Scope	Category	2024 tCO ₂ e	Notes
Scope 1	Fuel / Company Transport / Fugitive GHGs	0	No company vehicles, gas, or refrigerants.
Scope 2	Electricity / Heat & Steam	0	All charging powered by 100% REGO-certified renewable electricity.
Scope 3.1	Purchased goods & services	0	Not reported separately (covered by Capital Goods).
Scope 3.2	Capital goods	330.83	Hardware procurement. Freight embedded in supplier costs.
Scope 3.3	Fuel & energy-related activities	0	No reportable activity.
Scope 3.4	Upstream transport & distribution	0	Captured within 3.2; activity-based tonne-km reporting from 2025.
Scope 3.5	Waste generated in operations	0	Managed by our office provider & subcontractors; monthly waste certs collected; annual audit.
Scope 3.6	Business travel	4.882	Flights, rail, bus, tube, accommodation.
Scope 3.7	Employee commuting & remote working	5.513	Commuting (all modes), home working, and serviced office use.
Scope 3.8	Upstream leased assets	0	Reported within Scope 3.7 (service office usage included above).
Scope 3.9	Downstream transport & distribution	0	N/A – not relevant to operating model.

Totals:

- Scope 1 = 0.000 tCO₂e
- Scope 2 = 0.000 tCO₂e
- Scope 3 = 341.23 tCO₂e

Emissions Reduction Targets

Our long-term ambition:

Qwello UK is committed to achieving operational Net Zero by 2030, ahead of the UK's legally binding national Net Zero target of 2050. This ambition demonstrates our leadership in emissions reduction and ensures we contribute proactively to the UK's long-term decarbonisation pathway.

Targets:

Absolute Reduction (Scope 3):

- Reduce Scope 3 emissions by at least 20% by 2030 compared to business-as-usual growth.
- Scope 1 and 2 remain at zero, reflecting our renewable-powered operations and service model.

Net Zero (by 2030):

- Achieve operational carbon neutrality through Scope 3 reductions and high-quality offsetting of any residual emissions.

Carbon Prevention (through EV charging):

- Deliver cumulative avoided emissions of >1,000 tCO₂e by 2030*, through scaling renewable-powered EV charging infrastructure.

Alignment with Standards:

- Structured in accordance with the Greenhouse Gas (GHG) Protocol, covering Scopes 1–3.
- Aligned with Public Procurement Notice (PPN) 06/21 (June 2021) and its Technical Standard for Carbon Reduction Plans.
- Ensures consistency with UK Government procurement and Net Zero objectives, supporting compliance for participation in major public contracts under PPN 06/21.



GREENHOUSE
GAS PROTOCOL



* Planning basis and methodology: Projections assume average utilisation of 600 kWh per charge point per month and an avoided-emissions factor of 0.233 kg CO₂e per kWh, derived from Qwello UK's 2024 performance (154,987 kWh → 36.1 tCO₂e). The factor represents tailpipe emissions avoided versus petrol/diesel vehicles. Figures are indicative for planning and tender purposes and will be refined using UK-specific rolling 12-month kWh/CP data and third-party verification in the 2026 Carbon Reduction Plan update.

Emissions Compared: 2023 vs 2024

Category (GHG Protocol Ref.)	2023 Emissions (tCO ₂ e)	2024 Emissions (tCO ₂ e)	Change / Notes
Total (Scope 3)	56.17	341.23	↑ Significant increase due to expansion of charge point procurement (capital goods), fuller reporting of staff-related categories, and accounting for staff number increase from 2 to 6 people.
3.2 Capital Goods	Major share	330.83	↑ Increase driven by large-scale hardware procurement to support charging network rollout.
3.6 Business Travel	Low	4.88	↑ More trips (flights, rail, tube, accommodation) as headcount and operations grew.
3.7 Employee Commuting & Remote Working	Low	5.51	↑ Higher commuting, remote working and serviced office use as team expanded.
Scope 1 & 2	0	0	Remain zero (100% REGO-certified renewable electricity; utilities/waste subcontracted).

Summary

- Emissions have increased from 56.17 tCO₂e in 2023 to 341.23 tCO₂e in 2024, driven primarily by capital goods (hardware procurement) for charging network expansion, alongside fuller reporting of business travel and staff-related impacts.
- Scope 3 remains the only source of emissions; Scope 1 and 2 are zero, as Qwello UK has no direct fuel use and all electricity supplied through our network is REGO-certified renewable.
- Avoided emissions: In 2024, Qwello UK's network prevented 36.1 tCO₂e compared to petrol/diesel travel, equivalent to ~217,000 km of driving avoided.

Exclusions

- **3.5 Waste Generated in Operations** – Managed by our serviced office provider and subcontractors.
- **3.3 Fuel- and Energy-Related Activities (not in Scopes 1 & 2)** – Excluded as all electricity supplied is REGO-certified renewable.
- **3.9 Downstream Transportation & Distribution** – Excluded; not applicable to Qwello UK's operating model.
- **3.12 End-of-Life Treatment of Sold Products** – Not applicable, as Qwello retains ownership of charge points.

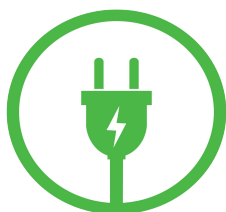
Completed Carbon Reductions

Overview

The following initiatives demonstrate Qwello UK's alignment with Public Procurement Notice (PPN) 06/21, evidencing our ongoing actions to reduce emissions and progress toward Net Zero by 2030 in line with UK Government expectations for supply chain participants.

Since establishing our 2023 baseline, Qwello UK has implemented targeted measures to reduce emissions within our operational control and to maximise the positive impact of our renewable-powered charging network.

Key initiatives delivered:



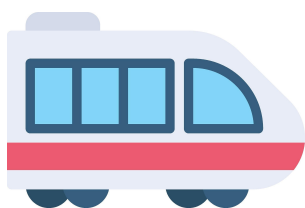
100% Renewable Electricity Supply (Scope 2):

All Qwello UK charging points are powered by REGO-certified renewable electricity. As a result, Scope 2 emissions remain at zero.



Supply Chain Sustainability Screening (Scope 3.2 – Capital Goods):

Annual supplier assessments are in place, prioritising partners with strong environmental credentials and sustainability practices. Hardware procurement (capital goods) remains the dominant driver of emissions, so supplier engagement is critical.



Business Travel & Commuting (Scope 3.6 & 3.7):

Low-carbon commuting is encouraged through flexible working and sustainable travel policies. Data collection is now in place for all employee travel and office use, enabling accurate monitoring and reduction planning.



Carbon Prevention through Charging Impact:

In 2024, our UK network supplied 154,987 kWh of renewable electricity, preventing 36.1 tCO₂e of emissions compared with petrol/diesel vehicles – equivalent to ~217,000 km of car travel avoided.

Exclusions managed by subcontractors:

Waste and water impacts are excluded from Qwello UK's footprint, as they are managed directly by serviced office providers and subcontractors operating to high environmental standards.

Planned Carbon Reduction Initiatives

Overview

To achieve our 2030 operational carbon neutrality and Net Zero target, Qwello UK will continue to expand avoided emissions through EV charging, while actively reducing Scope 3 emissions across our supply chain and operations

Planned actions:

Supply Chain Reporting Improvements (Scope 3.2):

Introduce more granular freight and materials data collection by 2025, supported by annual supplier assessments to strengthen accountability in our hardware procurement (capital goods).

Waste & Resource Management (Scope 3.5):

Begin tracking waste data in collaboration with subcontractors and our serviced office provider, to ensure full visibility and alignment with the Greenhouse Gas Protocol.

Low-Carbon Commuting Initiatives (Scope 3.7):

Promote public transport, EV use, and cycle-to-work schemes to reduce commuting emissions, supported by flexible working policies and ongoing data collection.

Business Travel Reductions (Scope 3.6):

Apply stricter travel policies that favour virtual meetings, rail over air, and carbon-conscious booking practices.

Carbon Prevention Expansion:

Scale Qwello UK's charging infrastructure to achieve >1,000 tCO₂e cumulative avoided emissions by 2030, through growth of our REGO-backed charging network.

Annual Reporting & Full Plan Update:

Publish annual sustainability reports covering Scopes 1–3, with a comprehensive Carbon Reduction Plan update in Q2 2026 to reflect progress, new data, and third-party verification.

Planned Carbon Reduction Initiatives (Cont.)

2025

Supply Chain Reporting Expansion: Implement freight data disaggregation and collect more granular supplier data for Scope 3.2 (Capital Goods).

Waste & Resource Tracking: Begin capturing waste data with subcontractors and serviced office providers (Scope 3.5).

Low-Carbon Travel Policies: Apply stricter business travel rules favouring virtual meetings and low-carbon transport options (Scope 3.6).

2026

Full Climate Action Plan Update (Q2): Publish updated plan with 2025–26 performance data, progress on Scope 3 reductions, and third-party verification.

Enhanced Scope 3 Coverage: Expand reporting detail for Scope 3.2 Capital Goods (hardware/materials) and introduce more granular data for upstream transport and delivery (Scope 3.4).

Supplier Engagement Programme: Strengthen environmental criteria in procurement, linking supplier assessments to measurable carbon reductions.

2030

Operational Net Zero Achieved: Maintain zero Scope 1 & 2; reduce Scope 3 by $\geq 20\%$ against business-as-usual growth, offsetting any residuals with high-quality removals.

Cumulative Avoided Emissions $>1,000$ tCO₂e: Deliver system-wide decarbonisation benefits through expanded EV charging infrastructure.

Annual Transparency: Continue annual disclosure of emissions and avoided emissions, ensuring transparency and compliance with PPN 06/21 through publicly available Carbon Reduction Plan updates.

Conclusion

Operational Net Zero by 2030!

Qwello UK recognises its responsibility to measure, reduce, and transparently report its carbon impact while supporting the wider transition to zero-emission transport. With a 2023 baseline of 56.17 tCO₂e and a 2024 footprint of 341.23 tCO₂e (Scope 3 only), our focus remains on reducing emissions across our supply chain, business travel, and operational activities.

Our charging network continues to deliver substantial avoided emissions by providing 100% REGO-certified renewable electricity to EV drivers, directly enabling cleaner mobility.

Through annual reporting, supplier engagement, and clear reduction milestones, Qwello UK is committed to achieving operational Net Zero by 2030—aligned with Qwello Group's pan-European sustainability strategy and the UK's long-term decarbonisation pathway.

This Plan reaffirms Qwello UK's compliance with the principles and disclosure requirements of Public Procurement Notice (PPN) 06/21, supporting the UK Government's procurement and public-sector Net Zero goals.



Declaration

This Carbon Reduction Plan has been prepared in accordance with the Public Procurement Notice (PPN) 06/21 and its accompanying Technical Standard for Carbon Reduction Plans, as well as the Greenhouse Gas (GHG) Protocol – Corporate Standard and the Corporate Value Chain (Scope 3) Standard. Emission factors are based on UK Government conversion guidance for greenhouse gas reporting.

Scope 1 and Scope 2 emissions remain at zero, reflecting Qwello UK's renewable-powered operating model. Scope 3 emissions have been reported across all material categories, with a total footprint of 341.23 tCO₂e in 2024.

Qwello UK is committed to achieving operational Net Zero by 2030 through a combination of Scope 3 reductions, supplier engagement, and the offsetting of residual emissions with high-quality, verified removals.

This Carbon Reduction Plan was reviewed and approved by the Board of Directors of Qwello UK on 22 September 2025, in accordance with the governance requirements of PPN 06/21.

