

# quello

## UK Carbon Reduction Plan 2026

*Issued: 28/02/2026*

*Version 2*

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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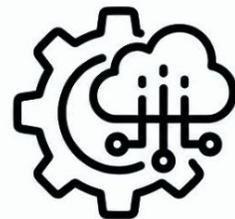
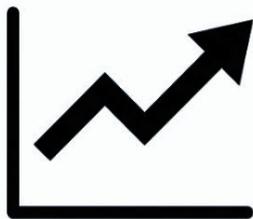
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# Performance Overview



# Executive Summary

Qwello UK is an electric vehicle Charge Point Operator (CPO) delivering public charging infrastructure across the UK, combining pan-European scale with local accountability and embedding sustainability across procurement, deployment and operations.

This Carbon Reduction Plan is prepared in accordance with PPN 06/21 and includes Scope 1, Scope 2 and the required Scope 3 categories (4, 5, 6, 7 and 9). Qwello UK commits to achieving Net Zero greenhouse gas emissions by 2050 at the latest, with an operational Net Zero ambition by 2030.

Scope 1 emissions are zero within the reporting boundary. Electricity is supplied via REGO-backed renewable tariffs, with Scope 2 emissions reported using both location-based and market-based methodologies; market-based emissions are zero due to REGO-backed electricity procurement. Equivalent location-based emissions are calculated using UK grid factors and disclosed separately.

Following rapid infrastructure expansion and expanded reporting coverage between 2023 and 2024, 2025 reflects a reduction in emissions against a restated 2024 baseline on a like-for-like basis, alongside continued network growth.

## 2025 Carbon Performance Overview



**2025 Emissions: 317.58 tCO<sub>2</sub>e**



**2024 Emissions (restated): 351.8 tCO<sub>2</sub>e**



**2023 Baseline Emissions: 59.29 tCO<sub>2</sub>e**



**Primary driver:** Infrastructure procurement remains the dominant emissions source



**Operational model:** Asset-light structure with no owned vehicles or direct fuel use



To better track performance independent of growth, 2025 introduces a carbon intensity metric per charge point. This marks a shift from purely absolute accounting toward performance-based carbon management within a scaling infrastructure business.



### Carbon Intensity per Charge Point (tCO<sub>2</sub>e per average operational CP)

(calculated using a time-weighted annual average of deployed infrastructure)

# Executive Summary

## Infrastructure & Decarbonisation Impact

Beyond reporting corporate emissions, Qwello UK continues to enable system-wide emissions reduction through renewable-powered EV charging.



**305,482 kWh**  
Total renewable electricity supplied



**1,328,000 km**  
Equivalent petrol/diesel kilometres avoided



**171.9 tCO<sub>2</sub>e\***  
Estimated avoided tailpipe emissions

In 2025, Qwello UK supplied 305,482 kWh of 100% REGO-backed renewable electricity through its public charging network. Based on UK Government conversion factors for average petrol and diesel vehicles (approximately 129.4 gCO<sub>2</sub>/km), this enabled avoidance of approximately 171.9 tonnes of CO<sub>2</sub>e emissions, equivalent to ~1.33 million kilometres of petrol/diesel vehicle travel avoided. This estimate reflects tailpipe emissions only and does not account for lifecycle emissions of vehicles or electricity generation.

Avoided emissions are reported separately from Qwello UK's Scope 1-3 inventory and are not used to offset reported emissions. Qwello UK also tracks:



Low-carbon business travel performance



Sustainable transport participation



Employee commuting emissions



Supply chain reporting improvements

## 2030 Commitment

Qwello UK remains committed to achieving **operational Net Zero by 2030**, ahead of the UK's national 2050 target. This will be delivered through:



Supplier engagement and embodied carbon data collection



Reduction of carbon intensity per charge point



Improved Scope 3 reporting accuracy



Responsible management of residual emissions

This Carbon Reduction Plan has been prepared in accordance with Public Procurement Notice (PPN) 06/21 and the GHG Protocol Corporate and Scope 3 Standards, ensuring compliance with UK Government procurement requirements and transparent reporting practices.

\*Avoided emissions are calculated using UK average passenger vehicle tailpipe emissions of 129.4 gCO<sub>2</sub>/km (Department for Transport data) and an average EV energy consumption of 0.23 kWh/km. These figures represent tailpipe emissions only and exclude lifecycle emissions from fuel production or vehicle manufacture.

## Mission Statement

At Qwello UK, we recognise that scaling electric vehicle infrastructure must go hand in hand with responsible carbon management. As a Charge Point Operator within Qwello GmbH's pan-European network, we are committed to delivering measurable emissions reductions while supporting the transition to zero-emission transport.

Our operational model is asset-light and supply chain driven. Scope 1 emissions are zero. Scope 2 emissions from purchased electricity are reported using both location-based and market-based methodologies, with market-based emissions reported as zero due to REGO-backed renewable electricity procurement. Equivalent location-based emissions are calculated using UK grid factors and disclosed separately. The majority of emissions arise from Scope 3 activities, particularly infrastructure procurement and capital goods.

As the network expands, carbon performance must improve alongside growth. In 2025, we introduced carbon intensity tracking per charge point to assess emissions relative to infrastructure scale and support performance-based decarbonisation.

Our commitments are structured around four core principles:

### 1. Accountability & Transparency

*Annual reporting in line with the GHG Protocol and PPN 06/21, including disclosure of Scope 1, Scope 2 and the required Scope 3 categories, supported by consistent methodologies and baseline restatement where required.*

### 2. Supply Chain Decarbonisation

*Collaboration with Qwello GmbH and key partners to reduce embodied carbon, improve supplier data quality, and increase use of primary emissions data.*

### 3. Operational Responsibility

*Monitoring and reducing emissions from business travel, employee commuting and operational activities, embedding low-carbon decision-making across day-to-day operations.*

### 4. System-Wide Impact

*Enabling emission reductions through renewable-powered EV charging. Avoided emissions are reported separately from Scope 1-3 and are not used to offset reported emissions.*

Qwello UK remains committed to achieving operational Net Zero by 2030, supported by reductions across Scope 2 and Scope 3 emissions, improved data quality, and responsible management of residual emissions.



# Organisational Boundary & Emissions Overview

## Reporting Framework

This Carbon Reduction Plan covers Qwello UK's operational activities for the reporting year 2025 and has been prepared in accordance with:

- GHG Protocol Corporate Accounting and Reporting Standard
- GHG Protocol Corporate Value Chain (Scope 3) Standard
- UK Government Environmental Reporting Guidelines (DEFRA conversion factors)
- Public Procurement Notice (PPN) 06/21 Technical Standard

## Organisational Control Boundary

Qwello UK applies an operational control boundary under the GHG Protocol.

Under this model:

- No company-owned vehicles or direct fuel combustion → Scope 1 = 0 tCO<sub>2</sub>e
- Electricity procured for operation of the public charging network is included within Scope 2 under operational control
- **Scope 2 emissions are reported using both location-based and market-based methodologies; market-based emissions are zero due to REGO-backed renewable electricity procurement, with equivalent location-based emissions calculated using UK grid factors and disclosed separately (not included in reported scope)**
- Upstream electricity emissions are reported under Scope 3 Category 3 (Fuel and Energy-Related Activities)
- The majority of emissions arise from Scope 3 categories, particularly purchased goods, capital goods and related supply chain activities

Qwello UK reports the required subset of Scope 3 categories (4, 5, 6, 7 and 9) in accordance with PPN 06/21. Our emissions profile reflects an asset-light operating model and renewable-backed electricity procurement.



Scope 1  
0 tCO<sub>2</sub>e



Scope 2  
(Market-based)  
0 tCO<sub>2</sub>e



Scope 2  
(Location-based)  
54.07 tCO<sub>2</sub>e



Scope 3  
317.58 tCO<sub>2</sub>e

Emissions are reported on a market basis.

# Scope 2 Electricity Reporting – Dual Methodology

## Scope 2 Reporting Approach

In accordance with the GHG Protocol Scope 2 Guidance, organisations procuring renewable electricity through contractual instruments are required to report Scope 2 emissions using two methods:

### Location-Based Method

- Reflects the **average greenhouse gas intensity** of the UK grid where electricity is consumed.
- Calculated using **UK Government (DEFRA/BEIS) grid emission factors**.
- Represents the **physical grid mix** supplying electricity.
- **Disclosed separately** and not included in reported totals



2025 Location-Based Scope 2: 54.07 tCO<sub>2</sub>e

### Market-Based Method

- Reflects emissions associated with **contractual renewable electricity** procurement.
- Calculated using **product-specific emission factors** where valid instruments exist.
- Qwello UK procures **100% REGO-certified renewable electricity** for its public charging network.



2025 Market-Based Scope 2: 0 tCO<sub>2</sub>e

## Reporting Treatment

Electricity purchased for operation of Qwello UK’s public charging network is included within Scope 2 under operational control.

Emissions are reported on a market basis, with Scope 2 market-based emissions equal to zero due to REGO-backed renewable electricity procurement.

**Equivalent Scope 2 emissions calculated using the location-based method are disclosed separately for transparency but are not included in reported emissions totals.**

Upstream electricity emissions are reported under Scope 3 Category 3 (Fuel and Energy-Related Activities).

Year	Total Emissions (tCO <sub>2</sub> e)	Context
2023	59.29	Baseline year (updated to include Scope 3 Category 3)
2024	351.8	Rapid infrastructure expansion and broader Scope 3 coverage
2025	317.58	Continued growth with improved reporting and emissions reduction

\*2023 and 2024 emissions restated to include upstream electricity emissions (Scope 3.3) for consistency.

# Scope 3 Emissions Overview

## Scope 3 Categories

In 2025, Scope 3 emissions (including upstream electricity under Category 3) arise primarily from:

- GHG Category 1: Purchased Goods and Services
- GHG Category 2: Capital Goods
- GHG Category 3: Fuel and Energy-Related Activities (upstream electricity)
- GHG Category 6: Business Travel
- GHG Category 7: Employee Commuting
- Upstream leased assets (serviced office operations)

Purchased goods and capital goods together account for approximately 90% of total Scope 3 emissions, representing the primary decarbonisation focus.

## PPN 06/21 Required Scope 3 Categories

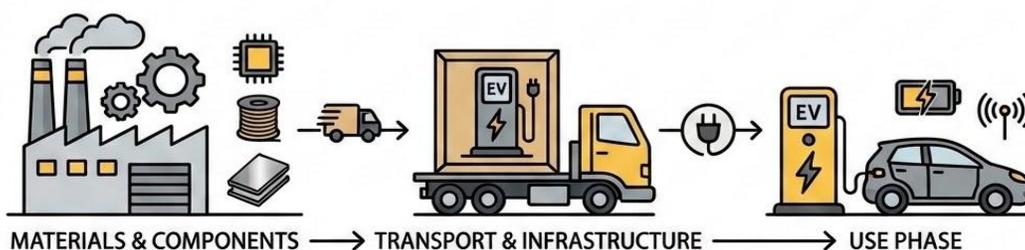
Qwello UK reports the required subset of Scope 3 categories in accordance with PPN 06/21:

- GHG Category 4: Upstream Transportation and Distribution – included within procurement-related emissions
- GHG Category 5: Waste Generated in Operations – minimal and managed via third-party providers
- GHG Category 6: Business Travel – reported using activity and spend-based data
- GHG Category 7: Employee Commuting – reported using employee survey data
- GHG Category 9: Downstream Transportation and Distribution – not material under the current operational model

Where emissions are minimal or not material, they are reported as zero or estimated using appropriate methodologies.

## Reporting Notes

- Scope 3 emissions are reported in accordance with the GHG Protocol Corporate Value Chain (Scope 3) Standard
- Scope 3 Category 3 includes upstream electricity emissions associated with purchased electricity
- Avoided emissions from EV charging are reported separately and are not deducted from the corporate footprint

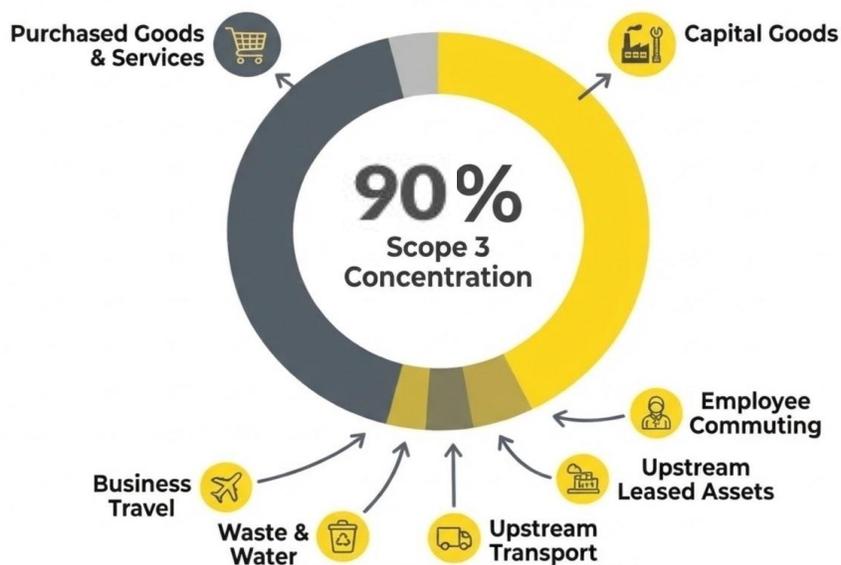


## 2025 Emissions Breakdown & Hotspot Analysis

**90% of 2025 emissions arise from infrastructure procurement (Purchased & Capital Goods)**

Category	tCO <sub>2</sub> e	%
Category 1: Purchased Goods & Services	142.53	44.9%
Category 2: Capital Goods	141.07	44.4%
Category 3: Fuel and Energy-Related Activities	20.8	6.6%
Category 4: Upstream Transportation & Distribution	0.61	0.2%
Category 5: Waste Generated in Operations	0.00	<0.1%
Category 6: Business Travel	6.22	2.0%
Category 7: Employee Commuting	5.05	1.6%
Category 9: Downstream Transportation & Distribution	0.00	0.0%

**Total = 317.58 tCO<sub>2</sub>e**



## 2025 Emissions Breakdown & Hotspot Analysis

Qwello UK's emissions profile is concentrated in infrastructure-related procurement.

- Category 1 (Purchased Goods & Services) and Category 2 (Capital Goods) together account for approximately 90% of total Scope 3 emissions, reflecting the embodied carbon associated with charge point hardware, materials and deployment.
- Emissions are distributed across both equipment procurement and installation-related capital deployment, with broadly comparable contributions from Categories 1 and 2.
- Operational emissions – including Category 6 (Business Travel), Category 7 (Employee Commuting), Category 4 (Upstream Transportation & Distribution) and upstream leased assets (serviced office) – represent a relatively small proportion of total emissions, consistent with Qwello UK's asset-light operating model.
- The concentration of emissions within procurement categories defines the primary decarbonisation focus: supplier engagement, embodied carbon reduction, and improved materials-level data.

### Reporting Improvements in 2025



Separation of inbound freight from capital goods (Category 4)



Separate reporting of serviced office emissions (upstream leased assets)



Enhanced Scope 3 category granularity and allocation



Introduction of carbon intensity tracking per charge point

# Carbon Intensity & Infrastructure Growth

Carbon intensity per charge point reduced by 54.7% between 2024 and 2025.

Year	Average Operational CPs*	Total Emissions (tCO <sub>2</sub> e market based)**	tCO <sub>2</sub> e per CP
2024	53.7	351.8	6.55
2025	107.1	317.58	2.97



Intensity calculated using Scope 3 emissions only, as Scope 1 and market-based Scope 2 emissions are zero.

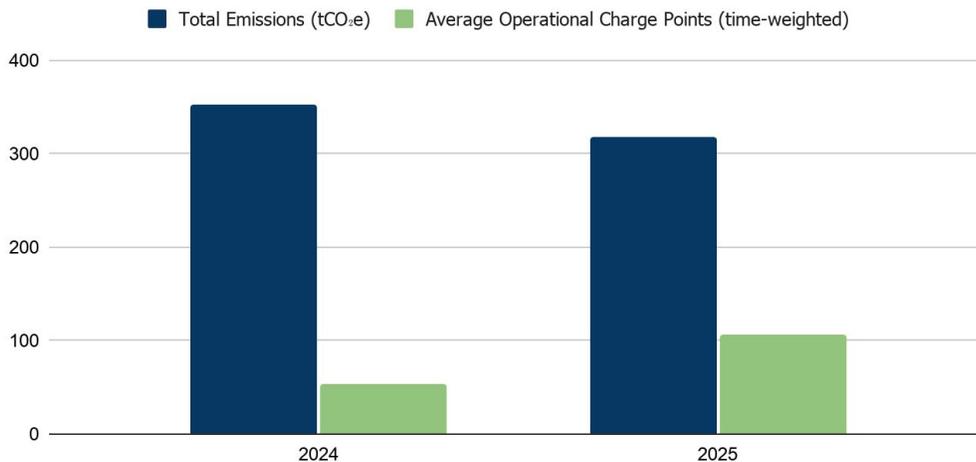
## Infrastructure Growth & Emissions Performance

Infrastructure deployment accelerated significantly in 2025, with operational charge points increasing from 62 at the start of the year to 161 by year-end. On a time-weighted basis, Qwello UK operated an average of 107 charge points in 2025 compared to 53.7 in 2024.

Total emissions reduced year-on-year from 351.80 tCO<sub>2</sub>e (restated) to 317.58 tCO<sub>2</sub>e despite substantial infrastructure growth. Carbon intensity per charge point reduced from 6.55 tCO<sub>2</sub>e in 2024 to 2.97 tCO<sub>2</sub>e in 2025 – a 54.7% reduction.

This metric reflects emissions per unit of deployed infrastructure and demonstrates improvements driven by scale efficiencies, procurement optimisation, and enhanced reporting granularity.

Total Emissions vs infrastructure Growth (2024 - 2025)



\*Average charge points calculated using monthly operational totals.

\*\*2024 emissions restated to include upstream electricity (Scope 3.3).

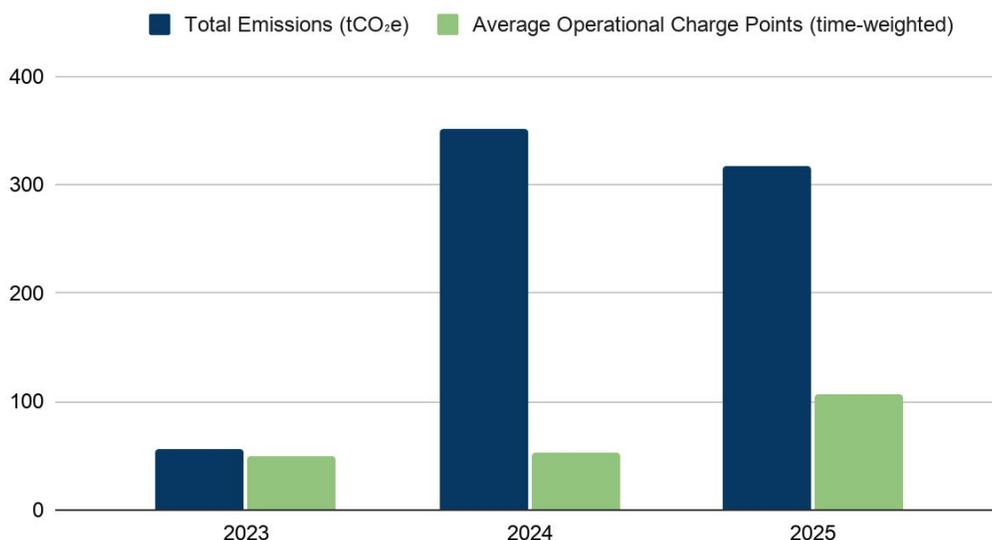
Intensity metric introduced in 2025 to track emissions performance relative to infrastructure growth.

## Three-Year Trend (2023–2025)

Emissions reflect infrastructure scale, with improved efficiency and absolute reduction in 2025.

Year	Total Emissions (tCO <sub>2</sub> e market based)	Avg Operational CPs
2023	59.29 (restated)	49*
2024	351.8 (restated)	53.7
2025	317.58	107.1

### Infrastructure Growth and Emissions Performance (2023–2025)



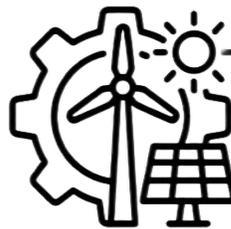
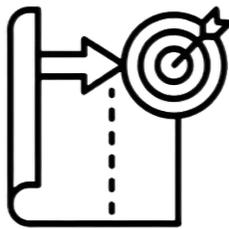
Qwello UK established its carbon baseline in 2023 during early-stage infrastructure deployment. The 2023 baseline has been restated to include upstream electricity emissions (Scope 3 Category 3) for methodological consistency.

The increase in emissions between 2023 and 2024 reflects rapid capital deployment and expanded Scope 3 reporting coverage.

In 2025, while infrastructure deployment accelerated significantly, total emissions (market basis) reduced year-on-year from 351.80 tCO<sub>2</sub>e (restated) to 317.58 tCO<sub>2</sub>e. Carbon intensity per charge point also reduced materially, indicating improved emissions efficiency relative to infrastructure scale. 2025 represents an approximately 10% reduction in total emissions compared to the restated 2024 baseline.

\*2023 average operational charge points estimated based on early-stage deployment records.

# Net Zero Strategy



# Pathway to Operational Net Zero 2030



Qwello UK is committed to achieving Net Zero greenhouse gas emissions by 2050 at the latest, with an operational Net Zero ambition by 2030. This will be delivered through a combination of emissions reduction, carbon intensity improvements, and responsible management of residual emissions.

## 1. Carbon Performance & Intensity Management

- Maintain zero Scope 1 emissions and continue transparent reporting of Scope 2 emissions in line with GHG Protocol methodologies
- Monitor and reduce Scope 3 emissions intensity as infrastructure deployment scales, while targeting absolute reductions over time
- Track and manage carbon intensity per charge point as the primary performance metric
- Maintain and further reduce carbon intensity relative to the 2024 restated baseline (6.55 tCO<sub>2</sub>e per CP)

## 2. Supply Chain & Embodied Carbon Reduction

- Collaborate with Qwello GmbH and suppliers to improve embodied carbon transparency, including use of Environmental Product Declarations (EPDs) where available
- Transition high-impact categories from spend-based to supplier-specific emissions data
- Integrate carbon performance criteria into procurement decision-making and supplier evaluation
- Improve data quality across freight, materials and upstream energy reporting (Scope 3)

## 3. Residual Emissions Management & Net Zero Delivery

- Continue annual Scope 1–3 reporting in accordance with the GHG Protocol and PPN 06/21, including required Scope 3 categories and dual Scope 2 reporting
- Prioritise reduction of material Scope 3 categories as infrastructure deployment matures
- Address residual emissions through high-quality, verified carbon removals aligned with recognised standards, where direct reduction is not feasible
- Maintain transparent public reporting of progress toward operational Net Zero

# Net Zero Delivery Plan 2026–2028



## 2026

### Data & Governance Strengthening

- Collaborate with Qwello GmbH to enhance embodied carbon transparency for core charging hardware, including Environmental Product Declarations (EPDs) where available
- Improve accuracy and granularity of capital goods and embodied carbon reporting within Scope 3 categories (particularly Categories 1, 2 and 3)
- Strengthen carbon intensity monitoring using time-weighted operational data
- Maintain clear categorisation of freight (Category 4), leased assets, and upstream energy reporting within Scope 3

## 2027

### Procurement & Embodied Carbon Reduction

- Integrate carbon performance criteria into supplier selection and evaluation processes
- Work with Qwello GmbH to obtain or develop EPDs for primary hardware categories
- Identify opportunities to reduce embodied carbon per charge point deployed
- Demonstrate continued reduction in carbon intensity per charge point relative to the 2024 restated baseline (6.55 tCO<sub>2</sub>e per CP)

## 2028

### Supply Chain Optimisation & Residual Planning

- Expand supplier engagement across high-impact Scope 3 categories
- Optimise logistics and freight consolidation to reduce transport-related emissions (Category 4)
- Assess projected residual emissions toward 2030 under the operational Net Zero pathway
- Develop a strategy for high-quality, verified carbon removals aligned with recognised standards, where direct reduction is not feasible

Annual Scope 1–3 emissions will continue to be reported in accordance with the GHG Protocol and PPN 06/21, including required Scope 3 categories and dual Scope 2 reporting.

# Impact and Reporting



## Infrastructure Impact & Avoided Emissions

### Renewable-powered EV charging enabled estimated avoided tailpipe emissions in 2025.

In 2025, Qwello UK supplied 305,482 kWh of renewable electricity (REGO-backed) through its public charging network.

Based on UK average passenger vehicle tailpipe emissions (129.4 gCO<sub>2</sub>/km) and an assumed EV energy consumption of 0.23 kWh per km, this equates to approximately 1.33 million kilometres of internal combustion vehicle travel displaced and 171.9 tonnes of CO<sub>2</sub>e emissions avoided.

Avoided emissions are reported separately from Qwello UK's Scope 1-3 footprint and are not used to offset reported emissions. These figures are presented for informational purposes only and are not included within the Scope 1-3 emissions inventory.

**305,482 kWh**

Renewable electricity supplied

**1.33 million km**

Equivalent petrol/diesel kilometres enabled

**171.9 tCO<sub>2</sub>e**

Avoided tailpipe emissions

**2,852 kWh**

Average electricity supplied per operational Charge Point (2025)

# Data Quality & Reporting Development

## Current Methodology Overview

### 2025 Reporting Approach

- Scope 1: Zero under operational control boundary
- Scope 2: Reported using location-based and market-based methodologies in line with the GHG Protocol
- Scope 3: Combination of spend-based, activity-based, and supplier-specific data.
- Emission factors aligned with UK Government (DEFRA) greenhouse gas conversion factors.

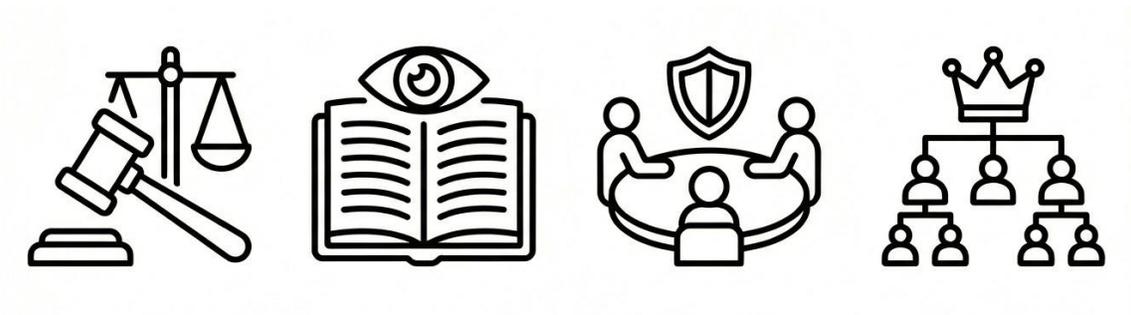
**Procurement-related categories (Categories 1 and 2) represent approximately 90% of total Scope 3 emissions; improving embodied carbon data quality remains a priority.**

Scope	Category (GHG Protocol)	Data Type	Quality Level
Category 2	Capital Goods	Spend-based	Medium
Category 1	Purchased Goods & Services	Spend-based	Medium
Category 6	Business Travel	Activity-based	High
Category 7	Employee Commuting	Survey-based	Medium
Category 8	Upstream Leased Assets	Supplier data	High
Category 4	Upstream Transport & Distribution (Freight)	Activity-based (tonne-km)	Medium-High
Category 3	Fuel and Energy-related Activities	Activity-based	Medium

## 2026–2028 Planned Improvements

- Transition high-impact categories from spend-based to supplier-specific emissions data where feasible.
- Improve activity-based reporting across freight, materials, and upstream energy categories.
- Expand Scope 3 coverage where material and relevant.
- Continue refinement of carbon intensity methodology.

# Governance



# Carbon Reduction Measures (2026–2030)

## Infrastructure & Procurement (Primary Impact Area)

- Collaborate with Qwello GmbH to enhance embodied carbon transparency for core hardware
- Increase use of supplier-specific emissions data in high-impact Scope 3 categories (particularly Categories 1 and 2)
- Integrate carbon performance criteria into procurement decision-making
- Identify lower-carbon material and design alternatives where feasible
- Optimise freight consolidation to reduce transport-related emissions (Category 4)



## Operational Emissions (Secondary Impact Area)

- Maintain zero Scope 1 emissions and maintain zero market-based Scope 2 emissions through REGO-backed renewable electricity procurement
- Limit air travel and prioritise lower-carbon alternatives within Scope 3 Category 6 (Business Travel)
- Encourage low-carbon commuting and flexible working practices (Scope 3 Category 7)
- Monitor, manage and reduce business travel emissions annually (Scope 3 Category 6)



## Reporting & Intensity Management

- Maintain and refine carbon intensity monitoring per charge point
- Deliver sustained reduction in carbon intensity relative to the 2024 restated baseline (6.55 tCO<sub>2</sub>e per CP)
- Improve accuracy and granularity of Scope 3 data collection
- Expand activity-based reporting across freight, materials and upstream energy categories
- Review embodied carbon per charge point deployment annually



Annual Scope 1–3 emissions will continue to be reported in accordance with the GHG Protocol and PPN 06/21, including required Scope 3 categories and dual Scope 2 reporting.

## Conclusion

Qwello UK's 2025 Carbon Reduction Plan reflects a maturing and increasingly performance-driven approach to emissions management within a scaling infrastructure business.

In 2025, total emissions (market basis) reduced by approximately 10% year-on-year (restated) despite significant infrastructure expansion, while carbon intensity per charge point improved by 55%. This indicates improved emissions efficiency relative to infrastructure growth as deployment accelerates.

While emissions remain concentrated in procurement-related categories, Qwello UK will continue to prioritise supplier collaboration, embodied carbon transparency, and improved Scope 3 reporting accuracy and data quality, alongside responsible freight and operational management.

Qwello UK remains committed to achieving Net Zero greenhouse gas emissions by 2050 at the latest, with an operational Net Zero ambition by 2030. This will be delivered through measurable reductions across Scope 2 emissions and Scope 3 categories, transparent reporting, and responsible management of residual emissions. Procurement-related categories will remain the primary focus of decarbonisation efforts as infrastructure deployment continues to scale.



## Declaration & Board Approval

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 and use the appropriate Government emission conversion factors for greenhouse gas company reporting.

This Carbon Reduction Plan has been prepared in accordance with:

- Public Procurement Notice (PPN) 06/21 and its Technical Standard
- The GHG Protocol Corporate Accounting and Reporting Standard
- The GHG Protocol Corporate Value Chain (Scope 3) Standard
- UK Government Environmental Reporting Guidelines and associated DEFRA greenhouse gas conversion factors

Qwello UK applies an operational control boundary. Scope 1 emissions remain zero. Scope 2 emissions are reported using both location-based and market-based methodologies in line with the GHG Protocol. Scope 3 emissions have been assessed and reported in line with the required categories under PPN 06/21 and the GHG Protocol.

Qwello UK is committed to achieving Net Zero greenhouse gas emissions by 2050 at the latest, with an operational Net Zero ambition by 2030. This will be delivered through absolute emissions reduction, carbon intensity management, supplier engagement, and responsible management of residual emissions.

This Carbon Reduction Plan has been reviewed and signed off by the Board of Directors.

### Signed on behalf of Qwello UK:

Name: Martin Hale

Position: Managing Director

Signed: *Martin Hale*