

CARBON REDUCTION PLAN

PPN 06/21

REPLY

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Carbon Reduction Plan

Supplier name: Reply Limited

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Commitment to achieving Net Zero

Reply Limited is committed to achieving Net Zero emissions by 2030.

Organisation Explanation

GHG emission calculations are provided to Reply Limited by our parent company Reply S.p.A. Reply Limited is part of Region 3 (United Kingdom, Belgium, Belarus, France, Luxembourg) as defined by Reply S.p.A who report annually on Scope 1, Scope 2 and Scope 3 emissions. These are published annually on the Reply S.p.A website with the most recent report, the Consolidated Sustainability Statement, assured by a third-party assurance letter, located at – [REPLY Bilancio 2025 ENG.pdf](#)

By default Reply Limited is committed to Reply S.p.A's commitment to environmental sustainability

- Carbon Neutrality for its activities (Scope 1 and 2) by 2025, that has been achieved during 2025 with reference to the emissions of 2024 (as described within the 2025 Reply Group Sustainability Statement)
- Net Zero with respect to its value chain (overall direct and indirect activities) by 2030

The carbon reduction activities are a mixture of Reply S.p.A led activities across Region 3 and local UK based activities from the Reply companies who make up Reply Limited. This Carbon Reduction Plan applies to all Reply Limited companies.



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: 2021 (1st January to 31st December)

Additional Details relating to the Baseline Emissions calculations.

From 2021 calculations are provided for Scope 1 (direct greenhouse gas emissions, from the consumption of natural gas, diesel and gasoline), and Scope 2 (indirect energy emissions calculated from electricity consumption and district heating). Scope 2 indirect greenhouse gas emissions are calculated using two different methods:

- Location-based: reflects the average intensity of emissions relative to the grids providing the energy;
- Market-based: reports emissions related to electricity and district heating with Guarantees of Origin that prove the energy origin. In the absence of these guarantees, the calculation was made with reference to the residual mix, which entails higher emissions than the emissions calculated with the Location-based method.

And Scope 3 emissions, i.e., greenhouse gas emissions that are not under the direct control of the company but are indirectly linked to the value chain, upstream and downstream of its activities, in particular the upstream activities of the Group's business. The identification of emission sources was guided in particular by the company's defined strategy of identifying and understanding the risks and opportunities associated with emissions in its value chain, in order to set reduction targets, monitor performance and improve information to its stakeholders, thereby increasing the level of reporting transparency.

The Group's greenhouse gas emissions derive from its office-based organisation and are thus mainly due to the use of fossil fuels for heating, business travels, and purchase of electricity produced by third parties. The emissions deriving from Reply activities are thus very limited and linked to traditional assets such as electrical and heating plant. To report its emissions, the Reply Group has followed the five principles - relevance, completeness, consistency, transparency and accuracy - indicated in the GHG Protocol Corporate Accounting and Reporting Standard, balancing them according to its objectives.

The emission categories identified in accordance with the GHG Protocol for **2021** are as follows:

- **Category 1** – Purchased goods and services: emissions from purchase of services (e.g., postal services, cleaning services, cloud computing services, financial services) and from water consumption drawn from the public water supply;
- **Category 3** – Fuel- and energy-related activities (not included in Scope 1 or Scope 2): emissions associated with the extraction, refining and transportation of fuels (natural gas and diesel for heating; diesel and petrol for company cars) prior to combustion (well-to-tank); upstream emissions from electricity consumption and district heating (included since 2022);
- **Category 5** – Waste generated in operations: emissions from the treatment of wastewater and, as of 2023, from waste disposal;



- **Category 6** – Business travel: emissions from air and train travel, hotel stays, taxi use, and other travel-related activities, including reimbursed travel by personal car and fuel used for rental vehicles;

The Scope 3 categories excluded from the inventory in 2021 are:

- **Category 2** – Capital goods: emissions associated with the purchase of laptops and smartphones (added in 2024)
- **Category 4** – Upstream transportation and distribution: not explicitly calculated as it is already included under Category 1 and Category 2, due to the emission factors selected;
- **Category 7** – Employee commuting: emissions related to the transport of employees between their homes, their workplaces and emissions from remote work (added in 2024)
- **Category 8** – Upstream leased assets: excluded because, under the operational control approach used for emissions consolidation, these emissions are already included in Scope 1 and Scope 2;
- **Category 9** – Downstream transportation and distribution: excluded as it is not applicable to the nature of Reply Group's business;
- **Category 10** – Processing of sold products: excluded as it is not applicable to the nature of Reply Group's business;
- **Category 11** – Use of sold products: excluded as it is not applicable to the nature of Reply Group's business (added in 2025).
- **Category 12** – End-of-life treatment of sold products: excluded as it is not applicable to the nature of Reply Group's business;
- **Category 13** – Downstream leased assets: excluded as it is not applicable to the nature of Reply Group's business;
- **Category 14** – Franchises: excluded as it is not applicable to the nature of Reply Group's business;
- **Category 15** – Investments: excluded as it is not applicable to the nature of Reply Group's business.

Baseline year emissions: 2021 (1st January to 31st December)

EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	190 tCO ₂ e
Scope 2	217 tCO ₂ e (location based) 282 tCO ₂ e (market based)
Scope 3 (Included Sources)	246 tCO ₂ e - Category 1 – 1 tCO₂e - Category 3 – 43 tCO₂e - Category 5 – 1 tCO₂e - Category 6 – 201 tCO₂e



Total Emissions	935 tCO ₂ e
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Current Emissions Reporting

Reporting Year: 2025 (1 st January to 31 st December)	
EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	925.6 tCO ₂ e
Scope 2	763.2 tCO ₂ e (location based) 344.6 tCO ₂ e (market based)
Scope 3 (Included Sources)	14,341.2 tCO ₂ e - Category 1 – 8,388.1 tCO₂e - Category 2 – 2,246.2 tCO₂e - Category 3 – 299.7 tCO₂e - Category 4 - not explicitly calculated as it is already included under Category 1 and Category 2, due to the emission factors selected - Category 5 – 2.2 tCO₂e - Category 6 – 1,422.7 tCO₂e - Category 7 – 1,851.4 tCO₂e - Category 9 - excluded as it is not applicable to the nature of Reply Group's business - Category 11 – 130.9
Total Emissions	15,611.4 tCO ₂ e

Note the 2025 increase is due to how Reply S.p.A calculated the emissions at Group level. Specifically, with regard to Scope 3 Categories 1 and 2, namely Purchased Goods and Services and Capital Goods, the 2025 calculation approach included the full scope of purchased goods and services as well as capital goods. In the previous year, only selected emission sources deemed most representative were considered. As a result, the expansion of the reporting boundary led to a significant increase in the 2025 figures compared to 2024. Therefore, 2025 data are not comparable with those of the previous year. In addition, a new Scope 3 category was introduced in the 2025 inventory, Category 11 (Use of Sold Products), which includes emissions related to the use phase of hardware purchased externally by Reply and subsequently resold to third-party clients.



Emissions reduction targets

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

- **Carbon Neutrality for its activities (Scope 1 and 2) by 2025:**
- **Net Zero with respect to its value chain (overall direct and indirect activities) by 2030**

The Carbon Neutrality target for 2025 refers to the full offsetting of the Group's Scope 1 and Scope 2 emissions by 2025. This target has been achieved during 2025 with reference to the emissions of 2024. With regard to emissions for 2025, the Group will adopt the same approach during 2026, making use of the same instruments. The Net Zero target refers to the objective of reducing Scope 1, 2, and 3 greenhouse gas emissions across the Group by 2030, and offsetting any remaining residual emissions, in order to achieve a net-zero emissions balance. With regard to the Net Zero target for 2030, defined on the basis of 2021 emissions data, the Group is currently in the process of defining a Transition Plan. The outcomes of the ongoing in-depth analyses, together with the evolution of emissions quantification over time, may lead to an update of the target beyond the current target year.

We project that carbon emissions will decrease by approximately 90% by 2030 (as described above) while the residual emissions will be neutralized through offsetting measures.

Carbon Reduction Projects

Completed Carbon Reduction Initiatives

The following environmental management measures and projects have been completed or implemented since the 2021 baseline with future planned initiatives also listed.

The main measures implemented by Reply to reduce emissions are as follows:

- Introduction of energy efficiency improvements in certain offices, for example through the installation of LED lighting and, where possible, the upgrading of building heating systems.
- Inclusion of hybrid or electric vehicles within the company fleet.
- Adoption of the Environmental Policy guidelines to reduce and monitor the environmental impact of the Group's activities, including in offices not owned by the Group.
- Establishment of the Reply Forest at Group level to absorb tonnes of CO₂ and support reforestation.
- Continuation of offsetting programmes to maintain Carbon Neutrality (for Scope 1 and 2) achieved in 2025 with reference to the emissions of 2024 and to support the Net Zero target by 2030 for CO₂ equivalent emissions. In 2025, almost all (99.8) of the Group's total electricity consumption was sourced from renewable energy, demonstrating the ongoing commitment to using lower-impact energy sources.
- In 2025, the Reply Group fleet reached 54.7% hybrid/electric vehicles, supported by the availability of dedicated charging stations both publicly accessible near offices and, in some main locations, installed for employee use. This represents a significant increase compared to 2024, when the share was 38%. Confirming the transition towards more sustainable mobility, in the United Kingdom the entire company fleet is already fully electric. Reply companies collectively own more than 1,800 trees through Treedom.
- Furthermore, the process for purchasing carbon credits for voluntary offsetting through certified projects and Energy Attribute Certificates has been consolidated.

In the future we hope to implement further measures including:

- The Group is currently in the process of defining a Transition Plan. The outcomes of the



ongoing in-depth analyses, together with the evolution of emissions quantification over time, may lead to an update of the target beyond the current target year. The initiation of the process to define the new science-based Transition plan, together with the related decarbonisation levers, demonstrates the Group's commitment to reducing greenhouse gas emissions across the entire value chain, in line with the objective of limiting global temperature increase to 1.5°C.

- Within office refurbishment projects, the Group is assessing the opportunity to pursue voluntary certifications related to energy efficiency and environmental footprint (e.g., LEED, BREEAM), which are already in place for some of the offices used by the Group across different regions.

In addition, in support of the above-mentioned objectives, the Group has set and reached the following intermediate targets as levers for the decarbonisation of its operations:

- Achieve 50% of electricity consumption from renewable sources in all countries by 2025, in line with the Environmental Policy's objective of promoting the use of renewable energy;
- Ensure that 30% of the vehicle fleet consists of hybrid/electric vehicles by 2025, in accordance with the Environmental Policy's goal of reducing transport-related emissions.

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 standard¹ and uses the appropriate Government emission conversion factors for greenhouse gas company reporting².

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) Standard³.

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:

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Name: Jason Hill

Role: CEO, Reply Ltd

Date: 1st June 2026

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>