



Policy Document

Carbon Reduction Plan and Climate Strategy

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| Document title | Carbon Reduction Plan and Climate Strategy |
| Version | 2.0 |
| Date issued | 30 April 2026 |
| Baseline year | 2025 |
| Reporting year | 2025 (baseline) |
| Next review date | 30 April 2027 |
| Document owner | Henry Sanford, Director |
| Approved by | The Board, Axion Solutions Ltd |
| Compliance | PPN 06/21 — Carbon Reduction Plan |
| Standards applied | GHG Protocol Corporate Standard; UK Government (DESNZ) conversion factors |

1. Commitment to Achieving Net Zero

Axion Solutions Ltd is committed to achieving net zero greenhouse gas emissions across our UK operations (Scope 1 and Scope 2) by 2030, and net zero across all scopes — including our full value chain — by 2050.

This Carbon Reduction Plan is published in accordance with Procurement Policy Note 06/21: Taking Account of Carbon Reduction Plans in the Procurement of Major Government Contracts (PPN 06/21). It sets out our baseline emissions, the scope of our reporting, our reduction targets, the projects through which those targets will be delivered, and the governance arrangements that hold us to them.

As a small UK-based research and consultancy SME, our absolute emissions are modest. Our commitment is to reduce them rigorously, to measure them honestly, and to expand the rigour of our reporting year on year as our primary data improves.

2. Baseline Emissions Footprint

Baseline year: 2025. This is also the current reporting year — Axion has not previously published a Carbon Reduction Plan, so the baseline and current-year figures are the same. The baseline will be held constant against future years to allow consistent year-on-year comparison.

Reporting boundary: All UK operations of Axion Solutions Ltd. The organisation comprises 6 FTE employees operating a hybrid working pattern (typically 2–3 days remote) from a small serviced office (~75 m²). The organisation does not own or operate vehicles.

Methodology: Emissions have been quantified in accordance with the GHG Protocol Corporate Standard, using UK Government (DESNZ) emission conversion factors. Where primary activity data is unavailable, conservative estimates have been applied based on the organisation's known activity profile. The full calculation methodology, including assumptions, activity data and emission factors used, is retained on file and available on request.

2.1 Total emissions — 2025 baseline

| Scope | Description | Emissions (tCO ₂ e) |
|------------------|--|--------------------------------|
| Scope 1 | Direct emissions — natural gas heating (office share) | 0.9 |
| Scope 2 | Indirect emissions — purchased electricity (office and home working) | 2.8 |
| Scope 3 | Indirect value-chain emissions — see breakdown below | 13.6 |
| Total | All scopes | 17.3 |
| Intensity | <i>Per FTE employee (6 FTE)</i> | 2.9 |

Per-employee intensity of 2.9 tCO₂e is consistent with published benchmarks for UK professional services SMEs (typically 2–4 tCO₂e per FTE). *Approximately 79% of total emissions sit in Scope 3, which is typical for low-asset, knowledge-based organisations.*

2.2 Scope 3 breakdown

The following Scope 3 categories from the GHG Protocol Corporate Value Chain (Scope 3) Standard have been included, in line with the PPN 06/21 required subset and with materiality for an office-based consultancy:

| Scope 3 category | Emissions (tCO ₂ e) | Basis |
|-------------------------------|--------------------------------|--|
| Employee commuting | 3.1 | 6 FTE × 3 office days × 48 weeks × 20 km, mixed mode |
| Business travel | 2.5 | Rail and short-haul flights; conservatively uplifted |
| Purchased goods and services | 6.0 | Spend-based (£60k × 0.10 kgCO ₂ e/£) |
| Waste generated in operations | 0.1 | 300 kg/year mixed waste |
| Water (upstream) | ≈ 0.0 | 10 m ³ /year (negligible at this scale) |
| Scope 3 total | 13.6 | <i>Conservative reporting basis</i> |

Categories not currently reported: upstream and downstream transportation and distribution (immaterial — no physical product); use of sold products (not applicable — services-based); end-of-life treatment of sold products (not applicable); investments (not applicable). These will be reviewed annually in case of business model change.

3. Emissions Reduction Targets

Axion has set the following ambitious, time-bound targets, aligned with a 1.5°C pathway and the trajectory recommended by the Science Based Targets initiative (SBTi) for SMEs:

| Scope | Target | Year | Absolute (tCO ₂ e) |
|--------------------------|--------------------------------|------|-------------------------------|
| Scope 1 + 2 | Net zero (100% reduction) | 2030 | 0.0 |
| Scope 3 | 42% reduction vs 2025 baseline | 2030 | ≤ 7.9 |
| Total (all scopes) | ~54% reduction vs baseline | 2030 | ≤ 7.9 |
| All scopes / value chain | Net zero | 2050 | 0.0 |

Approach: Scope 1 and 2 emissions will be eliminated through a combination of switching to certified renewable electricity and engaging with our landlord to address the gas heating share. Scope 3 will be addressed through travel policy, sustainable procurement practices, and continued hybrid working. Residual hard-to-abate emissions in 2050 will be addressed through high-quality, certified carbon removals, prioritising removals over avoidance.

Honesty about offsets: Axion does not currently rely on carbon offsets to claim net zero. Reductions will be delivered through real abatement first; offsetting will only be used for residual emissions that cannot be eliminated, and only with high-quality, third-party-verified credits.

4. Carbon Reduction Projects

The following initiatives are committed to deliver against the targets above. Progress on each is reviewed annually and reported in subsequent versions of this Plan.

| Area | Action | Timeline |
|-------------|---|-------------|
| Energy | Switch office electricity to a certified 100% renewable tariff (REGO-backed) | By end 2027 |
| Energy | Engage landlord and seek alternative low-carbon options for office heating, with the aim of eliminating gas-derived emissions | By end 2029 |
| Travel | Maintain remote-first / hybrid working as the default to minimise commuting emissions | Ongoing |
| Travel | Adopt a sustainable travel policy: rail as the default for UK travel; flights only where rail is not viable | By end 2026 |
| Procurement | Add carbon and sustainability questions to standard supplier due-diligence; prefer suppliers with published reduction plans where comparable on price and quality | By end 2026 |
| Procurement | Prioritise cloud and IT vendors that report renewable-powered infrastructure | Ongoing |
| Behaviour | Annual sustainability briefing for all staff covering low-carbon working practices | From 2026 |
| Measurement | Refresh the carbon inventory annually, expanding Scope 3 coverage as primary data improves | Annually |

Completed since baseline: As at the date of this Plan, Axion operates a default hybrid/remote-first working pattern, uses cloud-hosted IT in preference to on-premise infrastructure, and conducts the majority of client meetings virtually. These practices were already in place at baseline and form the operational starting point against which further reductions will be delivered.

5. Governance and Accountability

Overall accountability for the delivery of this Plan rests with the Board of Axion Solutions Ltd. The Director, Henry Sanford, is the named owner of the Carbon Reduction Plan and is responsible for:

- Refreshing the emissions inventory annually using current-year activity data;
- Tracking progress against the reduction targets and reporting on this in each annual review;
- Identifying and escalating any material risks to the delivery of the targets;

- Ensuring this Plan is reviewed at least annually, updated as appropriate, and re-published; and
- Maintaining the underlying calculation workbook and supporting evidence for inspection.

Where appropriate, Axion will draw on external expertise — including suitably qualified independent advisors — to validate emissions calculations and reduction approaches.

6. Measuring and Reporting Progress

Emissions are quantified and reported annually using the GHG Protocol Corporate Standard and the latest published UK Government (DESNZ) conversion factors. Each annual update will report: total emissions by scope; the change vs. baseline; performance against the published targets; progress on each carbon reduction project; and any methodological changes.

Where the methodology evolves — for example, as a result of moving from spend-based to activity-based estimates for a Scope 3 category — the change will be disclosed transparently and the baseline restated where necessary, in line with GHG Protocol guidance.

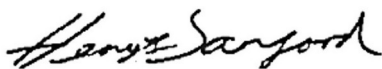
7. Declaration of Compliance with PPN 06/21

This Carbon Reduction Plan has been completed in accordance with PPN 06/21 and the associated guidance and reporting standard for Carbon Reduction Plans.

Emissions have been reported and recorded in accordance with the GHG Protocol Corporate Standard and using the appropriate UK Government emission conversion factors. Scope 1 and Scope 2 emissions have been reported in line with the Streamlined Energy and Carbon Reporting (SECR) requirements, and the required subset of Scope 3 emissions has been included as set out in the Corporate Value Chain (Scope 3) Standard.

This Carbon Reduction Plan has been reviewed and signed off at Board level. It is published on Axion Solutions Ltd's company website and will be refreshed annually. We confirm that this Plan is, to the best of our knowledge and understanding, accurate and complete.

8. Signed on behalf of Axion Solutions Ltd



Henry Sanford

Director, Axion Solutions Ltd

Date: 30 April 2026



David Harding

Director, Axion Solutions Ltd

Date: 30 April 2026

SUPPLEMENTARY — additional climate strategy content beyond PPN 06/21 requirements

9. Climate Strategy

This section sets out the wider Climate Strategy that complements our Carbon Reduction Plan. While the preceding sections satisfy the requirements of PPN 06/21, the Strategy below explains how Axion thinks about climate as a business-wide priority — beyond the direct emissions footprint — and how we aim to use our position as a research and digital consultancy to extend our impact through the work we deliver for clients.

9.1 Climate as risk and opportunity

Axion treats climate change as both a material business risk and a source of opportunity. As a consultancy with significant work in environmental research, biodiversity, natural capital, and public-sector digital transformation, our most consequential climate impact is delivered through the projects we work on, not through our own operational footprint. Our strategy is to combine rigorous internal decarbonisation with deliberate effort to maximise the climate value of the work we deliver for clients.

9.2 Climate-positive client work

Through the Axion Centre for Environmental Research (ACER) and our wider research, digital, and consultancy practices, we support clients including UK government departments, regulators, and local authorities to deliver climate-relevant outcomes. Examples include biodiversity and natural capital assessment, spatial analysis to support nature recovery, and digital tools that enable evidence-based environmental decision making. We will continue to prioritise work that contributes to the UK's net zero and nature recovery objectives.

9.3 Resilience and adaptation

We periodically assess climate-related risks to our operations, supply chain, and digital infrastructure. As a small, primarily digital business, our direct physical climate exposure is limited; the most material risks are to the continuity of our cloud infrastructure providers and to the wellbeing of our staff during extreme-weather events. Mitigation measures include hybrid working flexibility, reputable cloud providers with their own resilience commitments, and clear remote-working arrangements that allow work to continue when travel is disrupted.

9.4 People and culture

Our staff are central to delivering this strategy. All employees receive a sustainability briefing as part of their induction and an annual refresher. Staff are encouraged to surface ideas for reducing emissions, improving efficiency, or strengthening the climate value of our client work, and these are reviewed by the Director.

9.5 Suppliers and partners

Carbon and broader sustainability considerations are factored into supplier selection, alongside cost, quality, and other relevant criteria. As our procurement matures, we will progressively prefer suppliers who can evidence their own published carbon reduction plans, particularly for material spend categories such as IT, cloud, and professional services.

10. Conclusion

Axion Solutions Ltd is committed to playing its part in the transition to a net zero economy. Through this Carbon Reduction Plan and accompanying Climate Strategy, we have set out a transparent baseline, ambitious time-bound targets aligned with a 1.5°C pathway, and the specific projects through which we intend to deliver against them. Performance will be reviewed annually and reported transparently.

11. Contact

For questions about this Plan, or to request the underlying calculation workbook, please contact info@axionsolutionsltd.com.