STEPHENSON HARWOOD

Stephenson Harwood
Carbon reduction plan (CRP)
in accordance with Procurement Policy Note (PPN) 006

CARBON REDUCTION PLAN

Executive Summary

Stephenson Harwood is committed to achieving Net Zero emissions by 2050 at the latest.

This Carbon Reduction Plan (**CRP**) covers Stephenson Harwood's baseline year FY25 (May 2024 to Apr 2025) and FY26 (May 2025 to Apr 2026) setting clear UK specific targets, aligned to the Science Based Targets Initiative (**SBTi**) guidance to reduce greenhouse gas (**GHG**) emissions over key timeframes and planned actions to achieve carbon Net Zero. These targets sit within and support our global carbon reduction goals:

2035	**Scope 1 & 2**	63% absolute reduction in Scope 1 & 2 emissions
	Scope 3	66.4% carbon intensity reduction in Scope 3 emissions
2050 (at the latest)	Net Zero across all emission scopes, with minimum 90% absolute reduction and final 10% or less achieved through offsetting	

As a professional services organisation, Stephenson Harwood has a relatively small Scope 1 & 2 footprint. However, its Scope 3 value chain footprint is still significant with Category 1 – Purchased Goods and Services from its suppliers and Category 6 – Business Travel being key levers to reducing emissions. Plans are being developed, with a focus on these categories to support decarbonisation efforts.

Meeting the reporting requirements

This Carbon Reduction Plan complies with PPN 06/21. This document will be reviewed and updated annually in line with Stephenson Harwood's other reporting commitments.

Commitment to achieving Net Zero

Stephenson Harwood is committed to achieving Net Zero GHG emissions by 2050. We acknowledge the critical need to decarbonise the UK private and public sector consistent with the UK Government's commitment under the Climate Change Act.

Carbon footprint methodology

Stephenson Harwood quantifies and reports organisational energy consumption and GHG emissions in accordance with the Greenhouse Gas Protocol Corporate Standard (revised edition) using an operational control approach.

Reporting boundary: Consistent with PPN (006) regulations, the data disclosed in this report relates exclusively to Stephenson Harwood's UK operations.

The GHG sources that constitute Stephenson Harwood's operational boundary for this reporting period are:

Scope 1	Direct emissions from natural gas combustion in boilers used for heating in the UK office
Scope 2	Indirect emissions from electricity purchased for UK office operations
Scope 3	Indirect emissions from all other sources within Stephenson Harwood's value chain, related to UK operations

Emission factors: The latest carbon emission factors published by the UK Government's Department for Energy Security & Net Zero have been applied to the calculated activity data to determine the annual quantity of (location-based) emissions in tonnes of carbon dioxide equivalent (tCO_2e). For some Scope 3 categories where activity data is not available, spend-based multipliers/emissions factors have been used. These are published by the Department for Environment, Food & Rural Affairs as part of the calculation of the UK's national carbon footprint.

Operations: Stephenson Harwood is a law firm, operating multiple offices globally. As detailed within the carbon footprint (sections 5 &6), Scope 3 emissions are relatively high compared to Scope 1 & 2 emissions, which aligns to typical practice from a professional services firm. The majority of Stephenson Harwood's whole value chain emissions, or Scope 3 emissions, are a result of Stephenson Harwood's upstream supplier emissions and from business travel, both of which are common and significant sources of emissions for international professional services firms.

BASELINE CARBON EMISSIONS

Baseline year	FY25 (May 2024 to Apr 2025) and FY26 (May 2025 to Apr 2026)

Stephenson Harwood reports on 9 offices globally as of the baseline year. For this UK-based footprint/reduction plan, we will only report on Stephenson Harwood's London-based office.

Note that some of our baseline emissions have changed since our last report due to a comprehensive rebaselining exercise conducted to improve the data quality and approach.

Scope 1

The Stephenson Harwood Scope 1 data consists of gas usage in its London office.

Office location	**Tonnes CO_2e**
London	95

No Fleet is owned or operated so there is no data to report in Scope 1.

Scope 2

Stephenson Harwood's Scope 2 data consists of electricity purchased for the London office. This is on a 100% renewables green tariff.

Office location	**Tonnes CO_2e**
London (location-based)	219
London (market-based)	0

Scope 3

Category		**Tonnes CO_2e**	**% of Total Footprint**
1	Purchased goods & services	13,174	80.3
2	Fuel and energy (not inc. in Scopes 1 & 2)	112	0.7
3	Upstream transport	1	0.0
4	Operational waste (inc. water)	2	0.0
5	Business travel (inc. hotel stay)	2,897	17.7

6	Employee commuting	199	1.2
7	Downstream transport	12	0.1
Total		**16,398**	**100**

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FY26 CARBON EMISSIONS

Reporting year	FY26: 1st May 2025 – 30th April 2026

Stephenson Harwood has 9 reported on offices globally as of the baseline year. For this UK-based footprint/reduction plan will only report on Stephenson Harwood's London-based office.

Scope 1

The Stephenson Harwood Scope 1 data consists of gas usage in its London office. Note that some issues were identified with our building management system (including broken onsite meters) which caused some discrepancies in the collection of actual gas data. Estimations have been used to gap-fill, however there may be a change in values in future years as actual data is collated.

Office location	Tonnes CO_2e
London	95

No Fleet is owned or operated so there is no data to report in Scope 1.

Scope 2

Stephenson Harwood's Scope 2 data consists of electricity purchased for the London office. This is on a 100% renewables green tariff. Note that some issues were identified with our building management system (including broken onsite meters) which may have impacted our actual electricity consumption reporting. Estimations have been used to gap-fill, however there may be a change in values in future years as actual consumption data is collated.

Office location	Tonnes CO_2e
London (location-based)	234
London (market-based)	0

Scope 3

Category		Tonnes CO_2e	% of Total Footprint
1	Purchased goods & services	13,792	82.2
2	Fuel and energy (not inc. in Scopes 1 & 2)	144	0.9
3	Upstream transport	0.0	0.0
4	Operational waste (inc. water)	2.6	0.0
5	Business travel (inc. hotel stay)	2,620	15.6
6	Employee commuting	211	1.3
7	Downstream transport	10	0.1
Total		**16,779**	**100**

In total, Stephenson Harwood's UK associated carbon footprint is 16,874 tCO2e (market-based) which is an increase of 2.3% from the baseline in FY25. The largest contributing factors to this are increased spend with suppliers, increasing purchased goods and services emissions which are calculated using spend-based emissions factors. This was partially offset by a decrease in business travel emissions. A short-term goal is to continue to focus on improving data quality as much as possible whilst maintaining transparency, comparability and consistency in reporting. For this reason, we anticipate that future shifts in emissions could occur and may re-baseline if appropriate.

Emissions reduction targets

To continue progress to achieving Net Zero, Stephenson Harwood has adopted the following UK carbon reduction targets, which are proportionally aligned to our global net zero targets:

Near-term (2035)	Target of 63% carbon absolute reduction to Scope 1 & 2 emissions
Near-term (2035)	Target of 66.4% carbon intensity reduction to Scope 3 emissions
Long-term/NZC (2050)	Target of 100% carbon reduction to Net Zero including all emissions scopes (minimum of 90% absolute reduction with the final 10% or less being achieved through offsetting, if required)

These targets are aligned to the near-term and Net Zero carbon target guidance provided by the SBTi in order to reduce emissions on the 1.5 degrees of warming pathway. Our targets are aligned to the SBTi methodology, but they are not validated.

CARBON REDUCTION PROJECTS

Stephenson Harwood maintains both an ISO 14001 and 50001 certifications, ensuring the business is equipped to effectively manage environmental and energy impacts to rigorous and recognised standards. During the year ended 30 April 2026, the firm undertook several targeted operational efficiency initiatives:

A progressive LED replacement programme has been established, upgrading fluorescent light fittings to energy-efficient LED alternatives as fittings reach end of life. This measured approach ensures cost-effective improvements while minimising waste.

The number of racks in the firm's main server room has been reduced from 16 to 8, reducing on-site power consumption. Impacts from this upgrade are expected to be reflected in subsequent year’s reporting.

A new Building Management System has been implemented and is expected to be operational from September 2026. This enhanced monitoring capability will enable the firm to measure and validate energy reduction initiatives more accurately going forward.

Stephenson Harwood will continue working to reduce emissions over the next 12 months. The scope of works is detailed below.

Scope 1 (Gas & Fuel Actions)

Stephenson Harwood will take the following actions to reduce Scope 1 emissions:

Promote the efficient usage of gas by implementing building management systems with smart controls to optimise fuel use.
Refine regular interval commissioning and performance monitoring to help identify inefficiencies and understand where Stephenson Harwood has control to implement initiatives.

Scope 2 (Electricity) Actions

Stephenson Harwood will take the following actions to reduce Scope 2 emissions:

Continue to engage with the landlord to receive, understand and improve data collection in Stephenson Harwood’s London office including exploring submetering where feasible.

Complete an energy audit for the London office:

- Based on findings, develop a plan to improve energy efficiency and energy reduction
- Include where upgrades can be done to influence control (Lux, setpoints, etc.)
- Further engage with the landlord to understand opportunities for collaboration on improving systems and energy efficiencies
- Engage with the landlord to understand how green lease clauses can be incorporated into contractual/leasing agreements with a focus on data collection, data sharing and metering
- Continue engagement with renewable energy suppliers to procure the highest quality of renewable energy that are backed by the latest guidance

Scope 3 Actions

Stephenson Harwood will take the following actions to reduce Scope 3 emissions in its two highest-emitting categories – Purchased Goods and Services and Business Travel:

Purchased Goods and Services

- Further develop supplier ESG questionnaire
- Further develop sustainability weighted scoring in procurement
- Develop and implement Supplier Code of Conduct
- Develop a list of preferred suppliers through the evaluation process with prioritised B Corp or equivalent certified suppliers, those meeting minimum questionnaire score requirements, or those who have Environmental Product Declarations
- Establish supplier improvement programmes for underperforming vendors
- Further embed the supplier ESG assessment into all new supplier onboarding and contract renewals
- Launch annual responsible sourcing business reviews with key suppliers
- Update Procurement Policy to incorporate more ambitious sustainability criteria e.g. demonstrating measurable environmental improvements, transparent lifecycle assessments, suppliers with stewardship programmes and those who consider local and social impacts

Business travel

- Assess current business travel patterns within the London office including better understanding the need for travel, mode of travel used, distances travelled and class of travel
- Review travel policy to identify areas for implementing and/or tracking sustainable travel initiatives

- Engage with internal stakeholders to support implementation of updated travel policy and encourage behavioural changes with a focus on the need for business travel, mode of travel and the class of travel

Leadership

The Global Leadership team of Stephenson Harwood has given, and will continue to give, its full support to this Carbon Reduction Programme and the team required to achieve its Net Zero targets. The Sustainability team will continue to have executive-level support, supporting with implementing its Net Zero carbon strategy.

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DECLARATION

This Carbon Reduction Plan has been completed in accordance with PPN 06/21 and associated guidance and reporting standards 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 GHG company reporting.

Scope 1 and Scope 2 emissions have been reported in accordance with Streamlined Energy and Carbon Reporting (SECR) requirements, and the required subset. Further optional categories of Scope 3 emissions have also been reported in accordance with the published reporting standard for Carbon Reduction Plans and the Corporate Value Chain (Scope 3) Standard.

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

Signed on behalf of Stephenson Harwood:

KEVIN NORBURY
Chief Operations Officer
24 August 2026

Rebecca Carter

REBECCA CARTER
London Managing Partner
24 August 2026