Carbon Reduction Plan

Supplier name: Keys Group Limited

Keys Group (Keys) is a national care, education and health provider operating a large, diverse estate of residential homes, specialist schools, therapeutic centres, supported accommodation services and activity-based education sites across England and Wales. Through its family of brands of Accomplish, Keys, Peak, ALFA, Mable Therapy and ADHD 360, the organisation delivers person-centred support for more than 2,500 children, young people, adults and families each year.

Publication date: 9 March 2026

Commitment to achieving net zero

Keys Group is committed to achieving net zero emissions by 2045.

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.

Below is an itemised breakdown showing the amount in tonnes of carbon dioxide equivalent emissions (tCO_2e) produced by each Scope and material Category for the financial year (FY) 2025 baseline calculation. This includes emissions Scope and Categories required under PPN 006, with additional Scope 3 Category emissions reported beyond the requirements of Procurement Policy Note (PPN) 006, covering all emissions categories material to Keys Group.

Table 1. Keys Group: Baseline year FY2025 CO_2e Inventory:

Scope / Category	Item	Total tCO_2e	% of total Market-based tCO_2e
Scope 1*			
Stationary combustion	Gas and other fuels consumed on site	4,357.00	14.2%
Transportation	Owned and leased internal combustion engine (ICE) vehicles	2,209.62	7.2%
Refrigerants	Heating, ventilation and air conditioning (HVAC)	19.83	0.1%
Scope 2*			
Electricity (location-based)[1]	Purchased electricity, for own use (grid average)	2,074.49	N/A
Electricity (market-based)[2]	Purchased electricity, for own use (specific contract)	1,237.42	4.0%

* Scopes/Categories required to be reported under PPN 006

[1] Location based represents emissions from electricity consumption based on grid average emissions

[2] Market based represents emissions from electricity consumption based on specific energy contracts

Scope / Category	Item	Total tCO_2e	% of total Market-based tCO_2e
Electricity (electric vehicles)	Purchased electricity for vehicle use	-	-
Scope 3			
Category 1: Purchased goods and services	Goods and services	4,830.37	15.7%
Category 2: Capital goods	CapEx expenditure	2,904.23	9.4%
Category 3: Fuel and energy-related activities	WTT[3] & T&D losses[4] from electricity, stationary combustion of fuels and transport	2,003.11	6.5%
Category 4: Upstream transportation and distribution*	Transport between tier 1 suppliers or paid transport for goods (upstream & downstream) WTW[5]	13.49	0.0%
Category 5: Waste*	Waste disposal from operations	224.84	0.7%
Category 6: Business travel *	Land and air travel and hotel stays for business purposes WTW	1,176.10	3.8%
Category 7: Employee commuting & homeworking*	Employees commuting to and back from work WTW. Employees working from home	11,377.49	37.0%
Category 9: Downstream transportation and distribution**	Transport to customers (WTW)	-	-
Category 13: Downstream leased assets	Activity from assets leased to others	393.33	1.3%
Total Gross Emissions (Location based)		**31,583.91**	
Less emissions avoided by procurement of renewable electricity		-1,459.43	
Additional emissions generated from the procurement of non-renewable electricity (residual grid mix)		622.35	
Less emissions avoided by production of green electricity		-	
Total Gross Emissions (Market based)		**30,746.83**	**100.00%**
Less carbon offsets		-	
Total Net Emissions		**30,746.83**	

Current Emissions Reporting

The current reporting year (1 April 2024-31 March 2025) serves as the base year against which future measurements and reduction targets will be compared.

* Scopes/Categories required to be reported under PPN 006

** Required to be reported under PPN 006, but not material to Keys Group

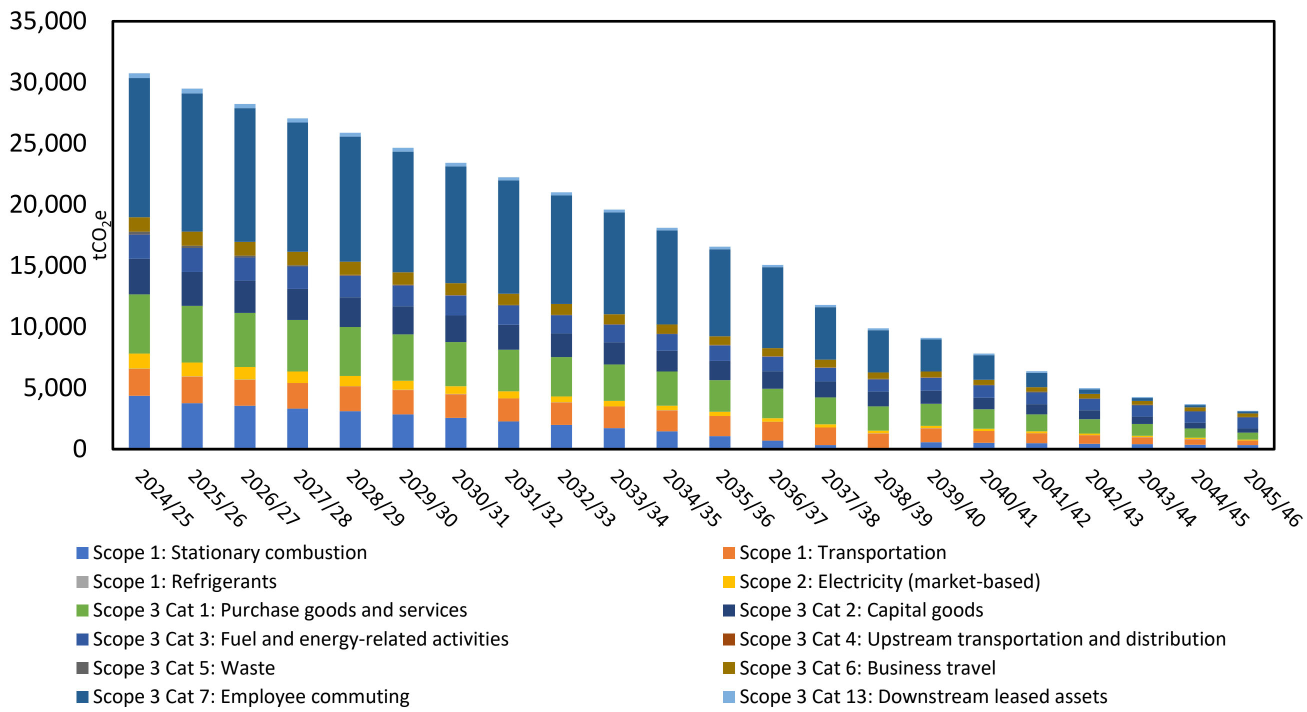
[3] WTT - Well-to-tank emissions. Emissions associated with the extraction, refinement, and transport of fuels before consumption

[4] T&D losses – Transmission and distribution losses. Emissions associated with the energy lost during the transmission of electricity through the network

[5] WTW – Well-to-wheel emissions. Includes emissions associated with the extraction, refinement, transport, and consumption of fuels

Emissions reduction targets

We predict that carbon emissions will decrease versus our baseline by of 90% by 2045. In order to continue our progress to achieving net zero, we have adopted the following CO_2e reduction targets as shown in our glidepath below:



We have aligned our reduction targets with the Science Based Targets initiative (SBTi) 1.5°Celcius (C.) pathway. This shows a natural reduction as the electricity grid is decarbonised and internal combustion engine (ICE) vehicles are phased out and replaced with ultra-low emission vehicles such as battery electric vehicles (BEVs). This will be achieved by:

Phase 1: Foundation & Efficiency (Years 1 - 3)

- Focus on low-hanging fruit and operational behaviour.
- Fleet (ICE Vehicles) - 2% annual reduction. Begin replacing the oldest, high-mileage diesel vans/cars with BEVs.
- Energy (Scope 2) - 5% annual reduction through LED retrofitting and improved building BMS (Building Management Systems) controls.
- Business Travel - 3% annual reduction by implementing a rail first policy for domestic trips.

Phase 2: Transition & Electrification (Years 4 - 7)

- Focus on infrastructure shifts as the 2030/2035 targets approach.
- Fleet (ICE Vehicles) - 5% annual reduction. Complete the installation of onsite charging infrastructure to support the transition all cars to BEV.
- Heating (Scope 1) - 4% annual reduction. Pilot a heat pump installation in a primary site to begin the phase-out of natural gas.
- Waste and water - 3% annual reduction by moving to a zero waste to landfill provider and enhancing recycling rates.

Phase 3: Deep Decarbonization (Years 8 - 12)

- The S-Curve acceleration point to meet mid-term targets.
- Fleet (ICE Vehicles) - 10% annual reduction. Full transition of heavy commercial vehicles. No new ICE vehicles permitted in the fleet.
- Energy (Scope 2) - 15% annual reduction. Fully 100% REGO-backed renewable energy contracts at all locations supported with onsite solar photovoltaics (PV) and battery storage.
- Supply Chain (Scope 3) - 5% annual reduction. Enforce green procurement where circa (c.) 50% of spend is with suppliers who have their own SBTi target aligned carbon reduction plan.

A summary of target percentages is shown in the table below.

Category	**Years 1-3**	**Years 4-7**	**Years 8-12+**
ICE Vehicle Replacement	2% / yr	5% / yr	10% / yr
Gas / Stationary Fuels	1% / yr	4% / yr	8% / yr
Electricity (Grid)	5% / yr	10% / yr	15% / yr
Value Chain (Scope 3)	2% / yr	3% / yr	5% / yr

Further detail is shown in Appendix A.

Carbon reduction projects

Completed carbon reduction initiatives

The following CO_2e reduction measures were in place during the reporting period:

Scope 1:

- An ongoing boiler replacement programme is underway across our estate, replacing lower efficiency gas boilers with higher efficiency boilers.
- Driver training provided to 31 drivers for safe and fuel-efficient driving.
- Vehicle telematics are in place, primarily for children's services which detect aggressive acceleration and as well as speeding alerts, promoting safe and fuel-efficient driving.
- Routine maintenance of Heating Ventilation and Cooling (HVAC) units carried out to ensure efficient operation and remediate refrigerant leaks.

Scope 2:

- During the reporting base year, certified renewable electricity was procured for 100% of sites where Keys Group is responsible for electricity procurement via our energy broker Inspired Energy, through Bryt Energy.
- Significant light emitting diode (LED) lighting upgrades undertaken across the estate where we have operational control.

Scope 3:

- Cycle to work scheme in place for Accomplish employees.

Future carbon reduction initiatives

Key actions from our carbon reduction plan are summarised below:

Scope 1: Stationary combustion AND Scope 2: Electricity consumption

Emissions from stationary combustion and market-based electricity consumption collectively account for 18.2% of our total emissions and is therefore a high impact area for our business due to our owned and leased property footprint. On-site energy consumption is also an area we have the ability to influence consumption through asset management, and therefore represents a priority area for action, with initial actions focused on improved visibility of building energy efficiency and energy consumption.

- Our initial focus will be to obtain a higher proportion of primary data for natural gas (kWh), propane and kerosene (litres) data as well as electricity (kWh) consumption data, reducing reliance on estimations for sites where data is not available. This will include engaging with landlords to obtain energy consumption data for sites where we are not responsible for energy procurement.
- Energy Performance Certificates (EPCs) will be obtained for all sites and integrated into our asset register. This will identify sites with lower energy efficiency and enable prioritisation of energy efficiency interventions for the lowest performing sites. Used in combination with primary energy consumption data, EPCs will also enable us to highlight sites with high energy consumption per square metre versus the energy efficiency rating, providing evidence for targeted energy efficiency interventions. It will also provide evidence of sites where site use, commissioning of HVAC and other energy-intensive equipment, and employee behaviour may be contributing to higher energy consumption.
- Where primary fuel and electricity consumption data is not possible to obtain, EPC data will enable the most accurate basis for estimation of site energy consumption.

Scope 1: Transport (owned and leased vehicles)

Emissions from owned and leased vehicles operated by the business is significant, accounting for 7.2% of market-based emissions and is an emissions Category we have scope to influence through selection of fuel-efficient vehicles, influencing fuel-efficient driving habits and ultimately transitioning the fleet to battery electric vehicles (BEV) in time. While we see limited scope in the short term to significantly upgrade our vehicle fleet due to cost constraints, significant investment will be required to reach out 2045 target. Initial actions will focus on improving our understanding of vehicle efficiency and emissions hotspots within the existing vehicle fleet:

- In addition to litres of fuel purchased, we plan to collect vehicle distance data and grams per kilometre vehicle data to understand vehicle fleet fuel efficiency, beginning with children's services where this data is most readily available. This will enable identification of segments of the fleet with lower real-world fuel efficiency, directing focus for targeted vehicle upgrades or additional driver training for to increase fuel efficient driving habits.

Scope 1: Fugitive emissions of refrigerant gases

Fugitive emissions from HVAC units is a low impact component of our emissions inventory, accounting for 0.1% of market-based emissions. We nevertheless see an opportunity to improve data collection associated with maintenance of our HVAC units:

- While planned maintenance of HVAC units is undertaken, maintenance reports do not currently provide refrigerant gas refill quantities in kilograms (kgs). We therefore plan to collect refrigerant refill quantities in kgs for the relevant refrigerant gas to replace estimated refrigerant leakage rates with actual refrigerant refills in kg. This will increase the accuracy of emissions calculations for this scope of our emissions, moving away from estimations to primary data for calculations from year 2.

Scope 3: Category 1: Purchased goods and services; Scope 3: Category 2: Capital goods; Scope 3: Category 4: Upstream transportation and distribution

At 25.2% of market-based emissions, these emissions categories are the second largest source of emissions for our business but are also the component of our emissions inventory most challenging to influence reductions, due to these emissions arising from the value chain beyond our operational control. Given our current reliance on spend-based data for emissions calculations in these categories, emissions intensity in this Category will naturally decay over time as the underlying emissions factors reduce through decarbonisation of the wider economy. We nevertheless aim to reduce reliance on spend-based data over time by engaging with our largest suppliers.

- Actions in the first year will focus on refining nominal descriptions in our finance software to ensure we continue to accurately categorise goods and services and capital goods spend.

Scope 3: Category 5: Waste

Despite accounting for only 0.7% of our total market-based emissions, waste is another Category we have significant scope to influence at sites where we are responsible for waste management. Reductions in this Category can be achieved through a combination of reducing waste generation, and through selecting waste fates with a lower global warming potential, primarily by reducing the proportion of waste to landfill.

- Primary waste data for sites where we managed waste is derived from our waste contractor, Sustainable Waste Services. Waste data for FY2025 was limited due to reporting on waste quantities (in kilograms) and waste fates starting in the last few months of FY2025. Data quality in this area will naturally improve as Sustainable Waste Services bring additional sites into our waste reporting dashboard and a full year of data is available for FY2026 reporting. This will enable us to rely less on extrapolated data for waste emissions calculations.
- As additional site waste management is brough under our waste contractor, we will have increased control of the proportion of waste that is disposed of via lower-emitting waste fates such as recycling and incineration, while reducing wate to landfill.

Scope 3: Category 6: Business travel (including hotel stays)

Business travel data includes mileage reclaim, train, bus and taxi travel, in addition to hotel nights, which overall account for 3.8% of total market-based emissions. Our initial priority in this Category is to improve the quality of data underlying emissions calculations, with a priority on mileage reclaim data which accounts for the majority of emissions in this category.

- Our primary action is to improve the precision of mileage reclaim data by capturing vehicle type, fuel type and ideally the grams per kilometre (g/km) of vehicles. This will enable us to associate vehicle and fuel-specific emissions factors to vehicle mileages, replacing the current methodology which relies on average vehicle emissions data. Improved visibility of vehicle type and efficiency will enable us to assess and shape emissions reduction interventions in this category.
- We additionally plan to introduce a Travel Policy which includes a travel hierarchy, with preference for lower impact travel modes where practical for the purpose of business travel.
- Longer-term, we plan to capture journey distance data for train journeys.

Scope 3: Category 7: Employee commuting and Homeworking

Emissions from this Category account for 37% of total market-based emissions making this the largest single source of emissions across the group. This reflects our workforce of 6,080 Full Time Equivalent (FTE) employees, the majority of whom are required to commute to their place of work. Calculations in this Category for the base year relied on known work patterns for different employee groups and relied on national statistics for the distance travelled and mode of travel used by employee groups to reach their place of work.

- Given the impact of this Category on our overall emissions, it is a priority for us to replace the use of national statistics with primary source data from our employees. We plan to do this via an Employee Commuting Survey to obtain primary data for transport modes, vehicle types and commuting distances specific to Keys Group employees.
- Employee homeworking accounts for a much smaller emissions value compared to employee commuting, but as part of the planned Commuting Survey, we plan to include homeworking information, including whether employees purchase renewable electricity at home.
- Once we have a more accurate picture of employee commuting modes and distances, including vehicle

types, we will be in a position to assess which emissions reduction initiatives may be feasible for this category.

Scope 3: Category 13: Downstream leased assets

This Category accounts for 1.3% or our total market-based emissions, with emissions arising from the properties leased to the people we support as part of our Supported Living services. The approach to carbon reduction in this Category therefore mirrors the plan for Scope 1: Stationary combustion and Scope 2: Electricity consumption where we have operational control of the sites.

Declaration and sign off

This Carbon Reduction Plan (CRP) has been completed in accordance with PPN 006 and associated guidance and reporting standard for Carbon Reduction Plans. Note that Keys Group has calculated and reported additional Scope 3 emissions categories not required under PPN 006 in this report, with required Scopes and Categories annotated in the baseline emissions footprint.

Emissions have been reported and recorded in accordance with the published reporting standard for Carbon Reduction Plans and the GHG Reporting Protocol corporate standard[13] and uses the appropriate government emission conversion factors for greenhouse gas company reporting.[14]

Scope 1 and Scope 2 emissions have been reported in accordance with SECR requirements (where required), 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) Standard.[15]

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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Simon Martle
Chief Financial Officer

Date: ……27th April 2026………………………….

[13] https://ghgprotocol.org/corporate-standard

[14] www.gov.uk/government/collections/government-conversion-factors-for-company-reporting

[15] https://ghgprotocol.org/standards/scope-3-standard

Appendix A - Glidepath data 2024/5 – 2045/6 (Market Based)

Category	24-5	25-6	26-7	27-8	28-9	29-30	30-1	31-2	32-3	33-4	34-5	35-6	36-7	37-8	38-9	39-40	40-1	41-2	42-3	43-4	44-5	45-6
Scope 1 Stationary	4,357.0	3,776.0	3,551.3	3,328.1	3,106.4	2,849.3	2,559.8	2,275.9	1,997.6	1,724.6	1,456.6	1,076.5	707.0	652.3	613.5	577.1	531.3	489.4	450.8	415.4	374.5	337.8
Scope 1 Mobile	2,209.6	2,165.4	2,122.1	2,079.7	2,038.1	1,997.3	1,937.4	1,879.3	1,822.9	1,768.2	1,715.2	1,629.4	1,531.6	1,424.4	1,282.0	1,128.1	958.9	815.1	692.8	554.3	443.4	354.7
Scope 1 HVAC	19.8	19.0	18.2	17.4	16.7	16.0	15.3	14.7	14.1	13.5	12.9	12.4	11.8	11.4	10.9	10.4	10.0	9.6	9.2	8.8	8.4	8.1
Scope 2: market-based	1,237.4	1,126.0	1,024.7	922.2	820.8	722.3	635.6	559.3	492.2	433.2	381.2	335.4	295.2	259.8	228.6	201.2	177.0	155.8	137.1	120.6	106.2	93.4
Scope 3 Cat 1:	4,830.4	4,627.5	4,424.6	4,221.7	4,018.9	3,816.0	3,613.1	3,410.2	3,207.4	3,004.5	2,801.6	2,598.7	2,395.9	2,193.0	1,990.1	1,787.2	1,584.4	1,381.5	1,178.6	975.7	772.9	570.0
Scope 3 Cat 2:	2,904.2	2,782.2	2,660.3	2,538.3	2,416.3	2,294.3	2,172.4	2,050.4	1,928.4	1,806.4	1,684.5	1,562.5	1,440.5	1,318.5	1,196.5	1,074.6	952.6	830.6	708.6	586.7	464.7	342.7
Scope 3 Cat 3:	2,003.1	1,953.1	1,891.4	1,831.2	1,772.6	1,708.5	1,634.2	1,562.3	1,492.8	1,425.5	1,360.5	1,273.7	1,186.5	1,149.7	1,107.0	1,062.6	1,012.5	979.5	953.5	924.6	902.2	887.1
Scope 3 Cat 4:	13.5	12.9	12.4	11.8	11.2	10.7	10.1	9.5	9.0	8.4	7.8	7.3	6.7	6.1	5.6	5.0	4.4	3.9	3.3	2.7	2.2	1.6
Scope 3 Cat 5:	224.8	171.9	138.1	104.2	70.3	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5	36.5
Scope 3 Cat 6:	1,176.1	1,158.8	1,123.1	1,097.4	1,051.7	1,008.1	966.4	926.6	888.5	820.4	758.6	702.5	661.0	623.2	529.0	461.6	413.0	377.7	351.5	331.8	316.6	304.6
Scope 3 Cat 7:	11,377.5	11,322.3	10,923.6	10,563.6	10,238.4	9,874.8	9,546.4	9,249.7	8,854.5	8,325.2	7,673.9	7,108.5	6,617.1	4,298.6	3,447.7	2,622.0	2,003.3	1,181.2	366.1	235.6	188.0	147.5
Scope 3 Cat 13:	393.3	376.8	360.3	343.8	327.3	310.7	294.2	277.7	261.2	244.7	228.1	211.6	195.1	178.6	162.1	145.5	129.0	112.5	96.0	79.5	62.9	46.4
Scope 1 and 2	7,823.9	7,086.5	6,716.3	6,347.4	5,982.0	5,584.9	5,148.1	4,729.2	4,326.8	3,939.4	3,565.8	3,053.7	2,545.7	2,347.8	2,134.9	1,916.8	1,677.3	1,469.8	1,289.9	1,099.0	932.5	794.0
Scope 3	22,923.0	22,405.6	21,533.7	20,712.0	19,906.7	19,059.6	18,273.3	17,523.0	16,678.3	15,671.6	14,551.5	13,501.3	12,539.2	9,804.1	8,474.4	7,195.0	6,135.7	4,903.3	3,694.1	3,173.0	2,745.9	2,336.4
Total	30,746.8	29,492.2	28,250.0	27,059.4	25,888.7	24,644.6	23,421.4	22,252.2	21,005.0	19,611.0	18,117.3	16,555.0	15,084.9	12,151.9	10,609.4	9,111.8	7,813.0	6,373.1	4,984.0	4,272.0	3,678.4	3,130.5
% Reduction Scope 1 &2	0%	9%	14%	19%	24%	29%	34%	40%	45%	50%	54%	61%	67%	70%	73%	76%	79%	81%	84%	86%	88%	90%
%Reduction in Scope3	0%	2%	6%	10%	13%	17%	20%	24%	27%	32%	37%	41%	45%	57%	63%	69%	73%	79%	84%	86%	88%	90%
% Reduction compared to Base Year	0%	4%	8%	12%	16%	20%	24%	28%	32%	36%	41%	46%	51%	60%	65%	70%	75%	79%	84%	86%	88%	90%