



FREETHS

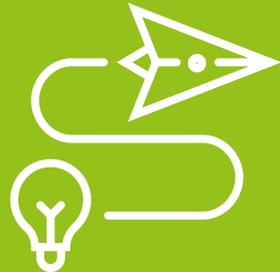
FREETHS

Net Zero Transition Plan

Key accreditations



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Foreword

At Freeths, we recognise the important role that the legal sector can play in helping embed responsible business principles into everyday practice. Environmental sustainability is a key priority for us – and as trusted advisers to our clients, we acknowledge our responsibility and embrace the opportunity to lead by example.

Our commitment to sustainability took a significant step forward in 2021 with the establishment of our Responsible Business Committee (RBC), which laid the groundwork for embedding Environmental, Social and Governance (ESG) principles across our organisation. We set an ambitious but achievable target to reach net zero by 2040, and our net zero targets have since been validated by the Science Based Targets initiative (SBTi). In 2025, we further strengthened our governance by appointing a Director of Responsible Business and Sustainability Manager to support delivery and drive progress.

Our Net Zero Transition Plan forms a key component of Freeths IMPACT, our responsible business mission to make a positive difference across colleagues, communities, climate and clients. It reflects our belief that responsible business is not a standalone initiative, but an integral part of who we are and how we operate.

Our core values of Smart, Bold and Together guide our approach. We aim to be 'Smart' by leveraging insight, data and expertise to identify the most effective solutions and implement them efficiently. We are 'Bold' in our willingness to set ambitious goals and embrace innovation. We are 'Together' in recognising that meaningful progress requires collaboration towards shared environmental goals.

We are committed to setting measurable objectives, transparently tracking our progress, achievements and failures, and adjusting our approach as needed as challenges and opportunities evolve. We recognise that reaching net zero will require innovation, investment and collective action, and we are dedicated to embedding sustainability into our decision-making processes, service delivery and valued relationships.

By applying our legal expertise alongside a genuine commitment to sustainability, we aim to reach net zero while supporting and inspiring others to do the same.



Mark Blakemore
Chief Operating Officer
March 2026

Accessibility statement

This report includes infographics designed to support the clear communication of complex information. However, some content may not be fully compatible with assistive technologies. If you require any information from this report in an alternative format, please contact us at responsiblebusiness@freeths.co.uk and we will be happy to help.

Introduction

This Net Zero Transition Plan sets out Freeths' net zero ambition and steps we will take to achieve it. The key objective of this document is to evidence the holistic and strategic planning that has taken place to ensure our targets are ambitious but achievable.

We may not have all the answers yet, but we feel confident about the immediate, short-term, and many of the medium-term steps we need to take. Our intention is to evolve this document as we grow our knowledge and understanding of possible solutions, in line with the evolution of external factors and technological advances. Our aim is to communicate regularly and transparently to provide reassurance to our stakeholders that this is an agenda we continue to take seriously and invest in.

This is our first Net Zero Transition Plan, and we've chosen to follow best practice and align it with the Transition Plan Taskforce (TPT) Disclosure Framework, which is now overseen by the International Financial

Reporting Standards (IFRS). The framework provides a structure for an entity to communicate how its climate targets and transition plan align with its overall business strategy. It consists of five disclosure elements: Foundations, Implementation Strategy, Engagement Strategy, Metrics and Targets and Governance, and it is supported by a guidance document to help with effective disclosure.

Alignment with the TPT Disclosure Framework is currently not mandatory in the UK, but it is considered best practice. As transition planning is a relatively new type of disclosure, we acknowledge that some of the criteria may not be immediately met. To address these gaps, we will initially focus on accessing better quality data and implementing necessary structures and processes, as these steps will enable us to make the right decisions later. We are committed to building on this disclosure, maintaining alignment with future iterations of the framework, and evolving our business processes as required.

This disclosure is the outcome of our collaboration with the environmental consultancy Planet Mark. It was important to work on this document with a trusted partner, to seek informed external challenge and to draw on relevant industry expertise and insights.

Approach to updating our Net Zero Transition Plan

We will align with the TPT disclosure requirements by publishing an updated version of the Net Zero Transition Plan every three years and reporting annual updates on our carbon reduction as part of our responsible business reporting cycle and ongoing progress monitoring.

As a Planet Mark Certified Net Zero Committed organisation, we will disclose progress against our Net Zero Transition Plan annually to ensure we stay on track with our decarbonisation goals. This process ensures that our emissions are externally verified, giving us the assurance to communicate our progress with confidence.

Alignment with relevant standards and disclosures

The TPT Disclosure Framework is designed to be consistent with, and build on, the International Sustainability Standards Board’s (ISSB) climate-related disclosures standard, IFRS S2 (formally Task Force on Climate-Related Financial Disclosure (TCFD)). It is also fully aligned with the guidance from the Glasgow Finance Alliance for Net Zero (GFANZ). This alignment ensures our planning and reporting remain compatible with emerging UK and international expectations.

B Corp

As a certified B Corp firm, our Net Zero Transition Plan aligns with the V2.1 B Corp standard published in April 2025, namely the Climate Action Topic requirements for companies of our size and sector:

- Track and measure emissions, ensuring data is externally verified;
- Set climate targets approved by the SBTi or other independent body to make a just contribution to the global goal of net zero greenhouse gas emissions by 2050;
- Externally publish climate action plan with the following specifications and regularly review progress:
 - Commits to supporting the global ambition to limit global warming to 1.5°C;
 - Includes specific, measurable, achievable, relevant, and time-bound (SMART) targets for performance and impact;
 - Specifies how the company will allocate human, technical and material resources for implementation;
 - Outlines how the company will engage and work with stakeholders;
 - Is approved by the highest governing body.

PPN 006

PPN 006 is a UK Government procurement policy that requires suppliers bidding for major central government contracts to demonstrate credible action on carbon reduction.

Bidders must submit a published, up to date Carbon Reduction Plan (CRP) at selection stage.

The CRP must:

- Confirm a commitment to achieve net zero by 2050;
- Display current baseline and annual carbon emissions (Scope 1 – 3);
- Report emissions for Scope 1 – 3;
- Outline environmental management and carbon reduction measures relevant to the contract;
- Be signed off at Board level and published on the supplier’s website;
- Be updated annually with latest emissions data.

Other relevant standards and bodies:



ISO 14001 is an international standard for environmental management systems that provides organisations with a structured framework to manage their environmental impacts, improve performance and ensure ongoing compliance. Freeths has maintained ISO 14001 certification since 2015.



Planet Mark is an independent sustainability certification body that helps organisations measure, report, and reduce their carbon emissions. Planet Mark have co-created Freeths’ Net Zero Transition Plan and annually verify Freeths Scopes 1-3 emissions data.



The Science Based Targets initiative (SBTi) is a global corporate climate action organisation that develops and validates science-based emissions-reduction targets to ensure companies align their decarbonisation pathways with the Paris Agreement and limit global warming to 1.5°C. The SBTi has verified Freeths’ 2040 net zero targets.

Foundations



What is net zero?

Net zero means cutting greenhouse gas (GHG) emissions to as close to zero as possible, with any remaining emissions re-absorbed from the atmosphere¹.

In accordance with the SBTi Corporate Net Zero Standard, an organisation can be considered net zero once it has reduced its emissions across all three scopes by at least 90% from its baseline².

The standard sets out that corporate targets should align with the ambition to limit global warming to 1.5°C, and that organisations should set near-term targets to deliver deep emissions reductions within the first 5-10 years after the baseline year.

Only unavoidable residual emissions (totalling no more than 10%) may be neutralised at the net zero target year using accredited carbon removal offsets.

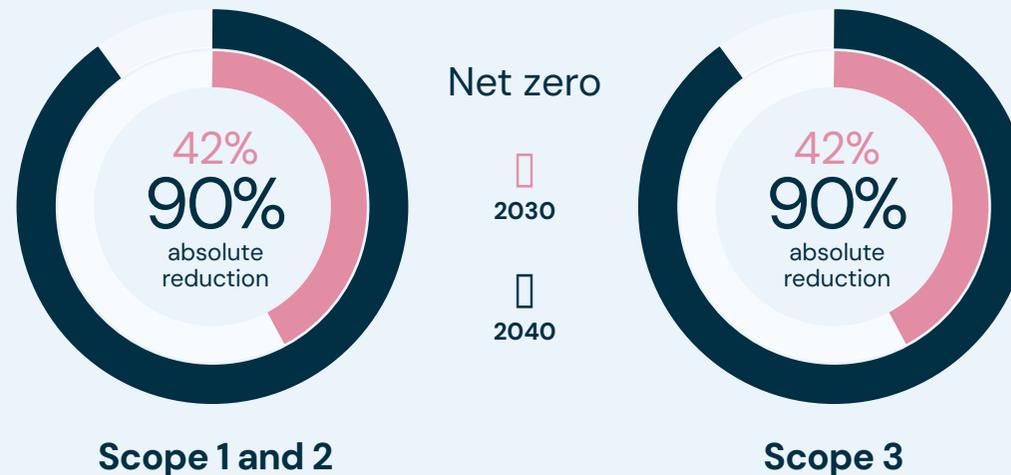
Our aim

We are committed to achieving net zero GHG across our value chain by 2040 from a FY2024 baseline, with the interim targets to reduce absolute Scope 1 and 2 emissions by 42% by 2030 and absolute Scope 3 emissions by 42% within the same timeframe.

In setting targets, we followed the SBTi Corporate Net Zero Standard as detailed previously in the document. In January 2026, our targets were approved by the SBTi.

Freeths uses its financial year (1st April – 31st March) for all accounting and has established a baseline year of FY2024. In line with the SBTi Corporate Net Zero Standard, near-term and long-term targets are assessed by the calendar year in which the majority of the months fall.

Therefore, financial year 2030-2031 is referred to as "2030" for our near-term targets, and financial year 2040-2041 is denoted as "2040" for long-term targets.



¹ United Nations, Climate Action. [Available here](#)

² Science Based Targets initiative 'SBTi Corporate Net-Zero Standard Criteria' March 2024 [Available here](#)

Why is net zero important to Freeths?

Achieving net zero is fundamental to how we deliver our purpose as a responsible, values-led firm. Addressing climate-related risks and opportunities is integral to our long-term resilience and to the communities and clients we serve.

As a B Corp firm, we have a responsibility to meet high standards of environmental stewardship, transparency and accountability, and to align our actions with climate science. Our net zero commitment provides a clear, credible framework for reducing our environmental impact across our value chain, strengthening trust with stakeholders.

Image: Solar-powered outdoor pods for collaborative working at Freeths' Milton Keynes office, Northgate House.

Freeths' Sustainability Strategy

Our Net Zero Transition Plan sits within Freeths' wider Sustainability Strategy and is a key mechanism for delivering our environmental ambitions under the Freeths IMPACT framework. Together, these commitments guide how we reduce our environmental footprint, respond to climate-related risks and opportunities, and support a more resilient and sustainable future for our firm, our clients and the communities we serve.

Our Sustainability Strategy is underpinned by four strategic objectives:

- ▣ **Net zero progress**
Driving sustained reductions in GHG emissions across our value chain, in line with climate science and our 2040 net zero commitment.
- ▣ **Efficient and circular operations**
Reducing energy demand, waste and resource use across our operations by using digital solutions and responsibly applied AI and embedding circular economy principles in our offices, procurement and ways of working.

- ▣ **An empowered and sustainable culture**
Equipping colleagues with the knowledge, tools and confidence to make sustainable choices and embed responsible behaviours into everyday decision-making.

- ▣ **Collaboration for positive impact**
Working with clients, suppliers and wider networks to extend our influence beyond our direct operations and support a just transition to a more sustainable economy.

The Net Zero Transition Plan supports each of these objectives, providing a clear and credible pathway to reduce greenhouse gas emissions, strengthen governance and accountability, and transparently track progress against science-based targets, focusing on the areas where we can have the greatest impact.



Focus areas for decarbonisation

Our Net Zero Transition Plan is centred on four key focus areas: Energy, travel, waste and recycling, and our supply chain. These areas reflect our main sources of emissions and provide the greatest opportunity for near-term and long-term reductions.



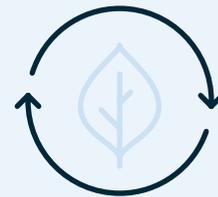
Energy

Energy use across our offices is a significant driver of our operational emissions. We are focused on improving efficiency and reducing demand through regular energy audits to identify savings, awareness-raising to promote energy-efficient office use, and the adoption of best-practice sustainable design in all future refurbishments. We are also phasing in smart building systems to optimise heating, cooling and lighting, supporting ongoing reductions in energy consumption and associated emissions.



Travel

Commuting and business travel form an important part of our Scope 3 emissions. We are taking action to support lower-carbon travel choices by increasing cycle storage and shower facilities where possible to encourage active commuting, promoting alternatives to high-emission vehicles through initiatives such as our Green Car Benefit Scheme, and reviewing business travel data to identify opportunities for reduction. Our business travel policy is being updated to ensure colleagues are following smart travel guidance that can help reduce emissions.



Waste and recycling

Reducing waste and embedding circularity are central to minimising our environmental impact. We are reviewing office supplies to prioritise reused and recycled materials, embedding circular design principles into office fit-outs and refurbishments, expanding recycling points with clearer signage, and phasing out single-use plastics across our operations. These actions support both emissions reduction and broader resource efficiency goals.



Supply chain

The majority of our emissions sit within our supply chain, making supplier engagement critical to achieving net zero. We are embedding sustainability criteria into procurement decisions, working with our largest suppliers to encourage and verify net zero commitments, and setting clear expectations that strategic suppliers align with our environmental and social standards. Improving the quality and coverage of supplier emissions data will be a key focus, enabling more accurate reporting and targeted decarbonisation action over time.

Dependencies

Assessing dependencies

Aligning business strategy with long-term net zero targets presents a unique challenge for organisations that are accustomed to 3-5 year planning cycles. Incorporating net zero requires pragmatic and innovative business planning to forecast a range of uncertain industry factors, economic fluctuations, and evolving stakeholder expectations. This initial assessment offers a high-level view of external dependencies for Freeths, and we intend to elaborate on this in future iterations of this report.

Our assessment is based on 'A framework for assessing and managing dependencies in corporate transition plans', developed by the Oxford Sustainable Finance Group and the Smith School of Enterprise and the Environment. It is expected that some of the dependencies may evolve over time and we remain committed to reviewing them regularly as part of our Net Zero Transition Plan updates.

The table to the right outlines the key dependencies that may impact our ability to achieve our net zero goals, grouped into Non-physical and Physical categories.

- Non-physical dependencies encompass regulatory, economic and behavioural factors influencing the pace and cost of transition, including government policies, market signals and client demand.
- Physical dependencies involve tangible enablers and constraints such as infrastructure, technology and natural resources necessary to support decarbonisation efforts.

By identifying these dependencies, we recognise that achieving net zero is reliant on wider systems, infrastructure and societal expectations. This table is not exhaustive but provides a structured framework to help us identify, monitor and respond to external factors, which will enable us to better anticipate risks, seize opportunities and build resilience into our planning.

Non-physical	Physical
National policy Any changes to the national policies aimed at reducing GHG emissions, new disclosure requirements and other climate-related requirements put on businesses.	Infrastructure and logistics Availability of data centres, including those required to power AI solutions, that demonstrate reduced emissions relative to industry baselines.
Regulatory framework Changes in real economy regulations, carbon pricing mechanisms and subsidies, or any changes to financial regulation.	Resource availability Availability of raw materials that are used in semi-conductors and batteries used for IT equipment.
Market and economics Energy and commodity prices will impact decarbonisation. We are looking into strengthening energy independence for the future to be immune from market fluctuations.	Availability of alternative fuels to reduce emissions from freight and business travel.
Grid capacity for higher electricity demand.	Technology Availability of suitable technology at scale to enable wider decarbonisation of the business.
Consumer and client behaviour Consumer demand for lower carbon services will have an impact on the speed of transition.	Access to renewable electricity across the business operations geographies.
Public acceptance Willingness of the local community to accept new technologies.	

Climate resilience

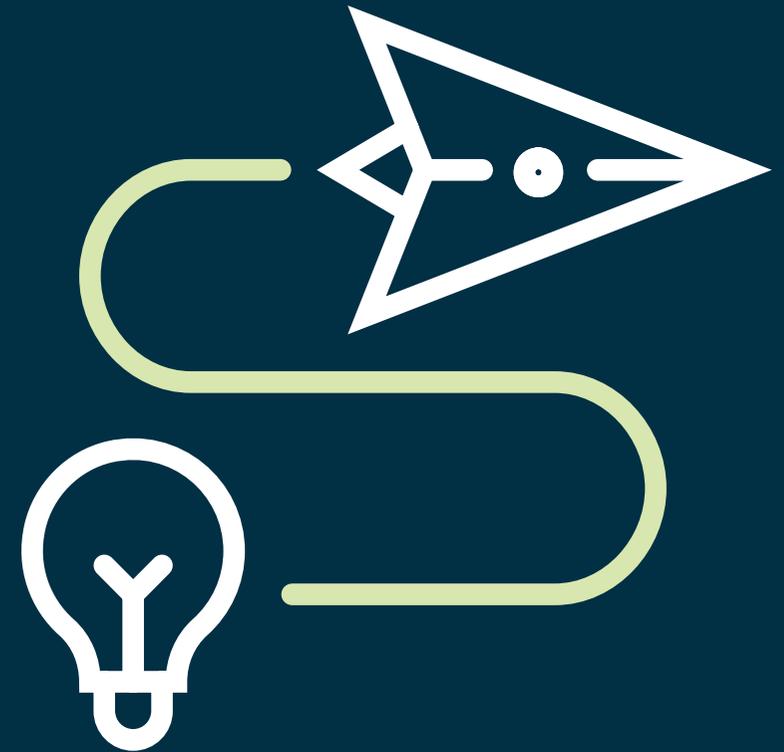
Climate-related risks

We have undertaken an initial assessment of climate risks to our business. Looking ahead, it is our aim to conduct a more comprehensive climate risk analysis to minimise risks and leverage potential climate-related opportunities.

This table highlights key climate-related risks and potential implications for our business. These scenarios will continue to be reviewed, and we will refine our mitigation and adaptation strategies appropriately as further review and analysis is undertaken. This work forms part of our commitment to building long-term climate resilience and will be further developed in future iterations of our Net Zero Transition Plan.

Climate-related risk factor	Potential impact	Mitigation action
 <p>Increased extreme weather events</p>	<p>Property damage</p> <p>Increased insurance costs</p> <p>Disruption to office access and service delivery</p>	<p>Business continuity planning</p> <p>Office location risk assessments</p> <p>Remote working capabilities</p>
 <p>Increased temperatures</p>	<p>Increased energy demand and operational costs for cooling, especially in older buildings</p> <p>Pressure on building systems in multi-tenanted offices</p>	<p>Energy efficiency upgrades</p> <p>Office design reviews</p> <p>Monitoring and managing energy use</p>
 <p>Regulatory requirements</p>	<p>Need to adapt legal practice to address sector-specific climate risks and due diligence expectations</p> <p>Financial penalties and reputational risk from non-compliance</p> <p>Increased resource requirements</p>	<p>Ongoing compliance monitoring and horizon scanning</p> <p>Third-party assurance of climate data</p>
 <p>Client and market expectations</p>	<p>Loss of business</p> <p>Reputational risk</p>	<p>Sustainability Strategy embedded in service delivery</p> <p>Climate training for client-facing teams</p> <p>Transparent reporting</p>

Implementation Strategy

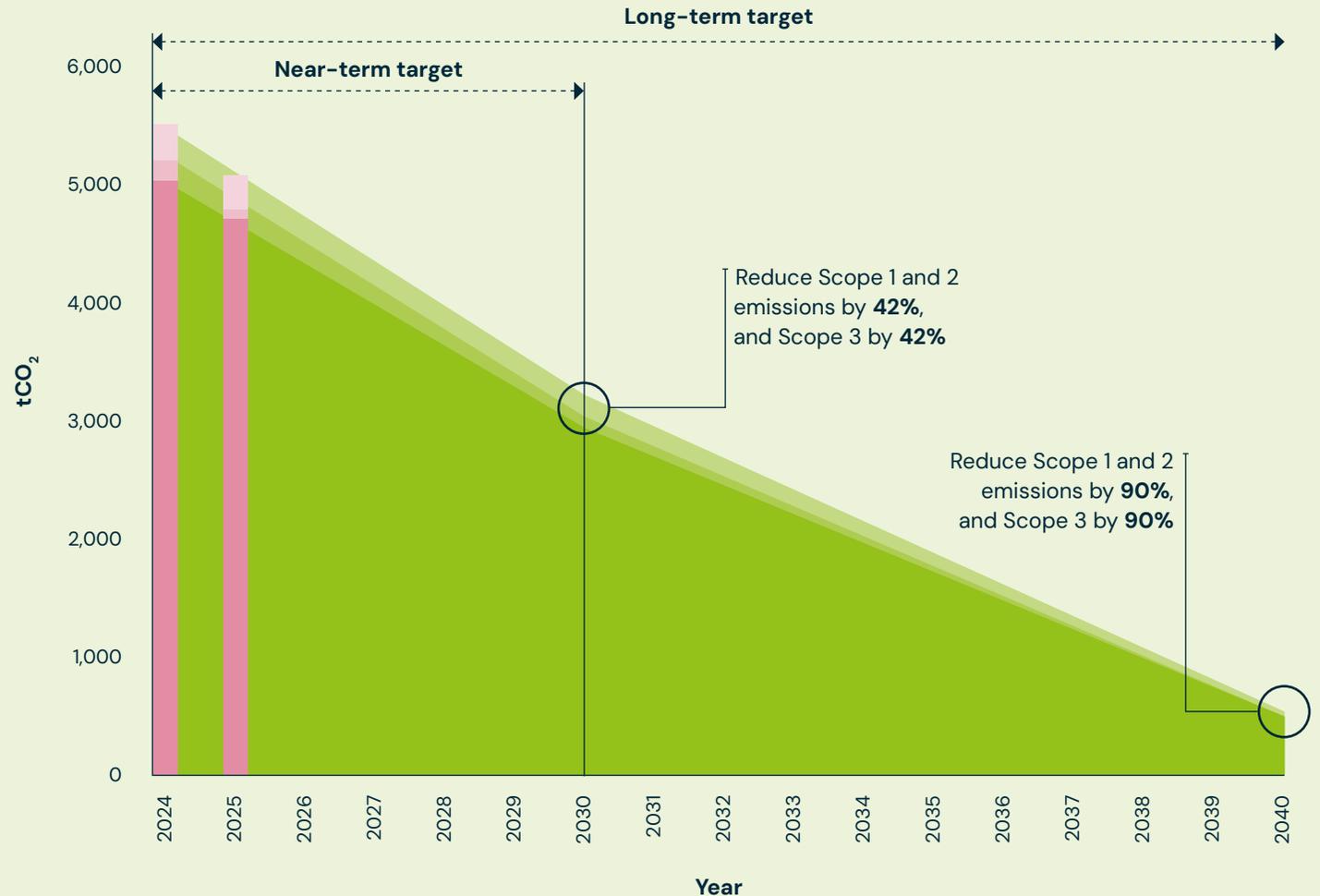


Theoretical path to net zero

This graph illustrates Freeths' net zero trajectory, showing our near-term and long-term targets for Scope 1, Scope 2 and Scope 3 emissions. It reflects a planned, year-on-year reduction pathway, consistent with climate science and best practice, rather than deferring action until the target year.

We recognise that this pathway is subject to uncertainty and external dependencies. Progress will be monitored on an annual basis and trajectory updated to reflect any changes in data quality, business activity and opportunities to accelerate reductions.

- Scope 3 trajectory
- Scope 3 measured footprint
- Scope 2 trajectory
- Scope 2 measured footprint
- Scope 1 trajectory
- Scope 1 measured footprint



Solutions for decarbonisation

To achieve our 2040 net zero target, we are implementing a comprehensive, phased decarbonisation approach. This will be delivered by individual business units and supported by a centralised governance model led by Freeths. Our actions are structured across four time periods:

- **Immediate (2026 – 2027):** Improve data quality, engage key suppliers and enhance sustainability skills within leadership and relevant teams.
- **Short-term (2028 – 2030):** Expand supplier engagement, implement targeted infrastructure upgrades and evaluate lower-impact emission areas to ensure reductions across all operations.
- **Medium-term (2031 – 2035):** Deliver larger building upgrades, embed supplier commitments and adapt governance to meet evolving regulatory requirements.
- **Long-term (2036 – 2040):** Enable the final steps toward net zero, maintaining transparency and collaboration across all stakeholders. Our approach will be updated as market clarity improves.



Focus areas:



Energy



Travel



Waste



Supply chain



All

Decarbonisation	Improve office energy efficiency and introduce fit-out standards designed to minimise emissions	Implement energy upgrades	Work with landlords to implement larger infrastructure upgrades, removing reliance on gas	Maintain transparent review of targets, actions and processes
	Require emissions reporting from key suppliers	Pilot further smart travel solutions		
	Mandate regular reporting of all waste streams from waste management company	Embed net zero expectations in supply chain contracts	Work with suppliers to provide more granular data	Enable final steps toward net zero
	Ensure waste suppliers have clear net zero commitments			
Engagement	Build net zero awareness and training across the organisation	Deepen supplier collaboration and peer engagement for decarbonisation	Agree comprehensive net zero plans with key suppliers, embedding timelines and transparent reporting	Work in partnership with suppliers, industry peers and community stakeholders to accelerate progress towards net zero
Governance	Establish Board accountability and embed net zero into decision-making	Set measurable targets and track progress for employee travel	Continue to review skills and governance structures to ensure readiness for long-term targets	Ongoing monitoring and management of Net Zero Transition Plan implementation
	Align incentives with net zero objectives	Embed sustainability skills into relevant roles, prioritising leadership, procurement and facilities management	Mandate carbon disclosure in key supplier contracts	
Policies	Maintain renewable energy procurement	Introduce policy updates to reduce business travel	Confirm all relevant policies are in place and aligned with regulatory changes	Conduct comprehensive policy review to validate readiness for net zero
	Promote access to transport methods designed to minimise emissions	Introduce a zero waste to landfill policy across operations		
	Strengthen sustainable procurement and travel policies			
	Immediate (2026 - 2027)	Short-term (2028 - 2030)	Medium-term (2031 - 2035)	Long-term (2036 - 2040)

Solutions addressing focus area emissions



Energy (Scopes 1 and 2): Work with building owners and managing agents to assess alternatives to gas-based equipment and agree a phased replacement plan. Continue to procure third-party certified renewable electricity across all offices, while improving metering, energy management and energy efficiency to reduce demand.



Travel (Scope 3; Categories 6 and 7): Improve the quality and consistency of business travel and employee commuting data, promote lower-carbon travel options and incentivise more sustainable commuting and business travel choices.



Waste and recycling (Scope 3; Category 5): Reduce waste at source, increase reuse and recycling, and work with suppliers and facilities managers to improve waste segregation, data quality and reporting.



Supply chain (Scope 3; Category 1): Implement a structured supplier engagement programme focused on purchased good and services, including collecting emissions data, promoting practices that reduce greenhouse gas emissions and aligning suppliers with our net zero ambitions through procurement requirements.

Focus Areas: Energy Travel Waste Supply Chain



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Policies

To support our decarbonisation strategy, we have reviewed the alignment between existing policies and our net zero objectives. These policies are reviewed annually, or sooner if there are any material changes to the firm or significant developments in the environmental or sustainability landscape, to ensure they are fit for purpose. In-scope policies include:

Environmental policy

Outlines our commitment to operating ethically and sustainably by monitoring and reducing environmental impact, complying with legislation and voluntary standards, and defining governance responsibilities. It encourages engagement through initiatives, prioritises energy efficiency and sustainable procurement, and leverages our ISO 14001-certified Environmental Management System to drive continuous improvement.

Procurement policy

Provides guidance on sourcing goods and services with strong governance, risk management and regulatory compliance. Integrates responsible business principles into procurement, focusing on sustainable sourcing, waste reduction and encouraging suppliers to adopt ethical and environmentally responsible practices.

Travel policy

Guides business travel and expense management, supporting compliance, cost-efficiency and wellbeing while advancing responsible business objectives. Encourages remote meetings where possible and lower-emission travel options. Centralised booking through Click Travel enables visibility of spend and carbon emissions for better management and reporting. Even though we recognise that we may have reduced influence over employee's choices when it comes to commuting, we aim to provide clear guidance within this policy to ensure we reduce emissions from that category.

Premises policy

Defines requirements for selecting or fitting out office spaces in alignment with strategic and responsible business objectives. Covers location, building quality and internal design, with updates to reflect advances in smart building technologies and energy efficiency standards.

Supplier Code of Conduct

The Supplier Code of Conduct sets minimum standards for organisations providing goods or services to Freeths. Updates will require suppliers to disclose measured emissions, set net zero targets and provide evidence of a decarbonisation action plan.

Environmental management system manual of guidance

Sets out the framework for Freeths' ISO14001:2015-certified Environmental Management System (EMS), defining the policies, procedures, roles and responsibilities used to manage environmental risks and impacts across the firm. The EMS provides a consistent approach to regulatory compliance, objective setting, performance monitoring and continual improvement across all in-scope offices and underpins delivery of the Net Zero Transition Plan by embedding environmental management and emissions reduction into day-to-day operations and decision-making.



Financial planning

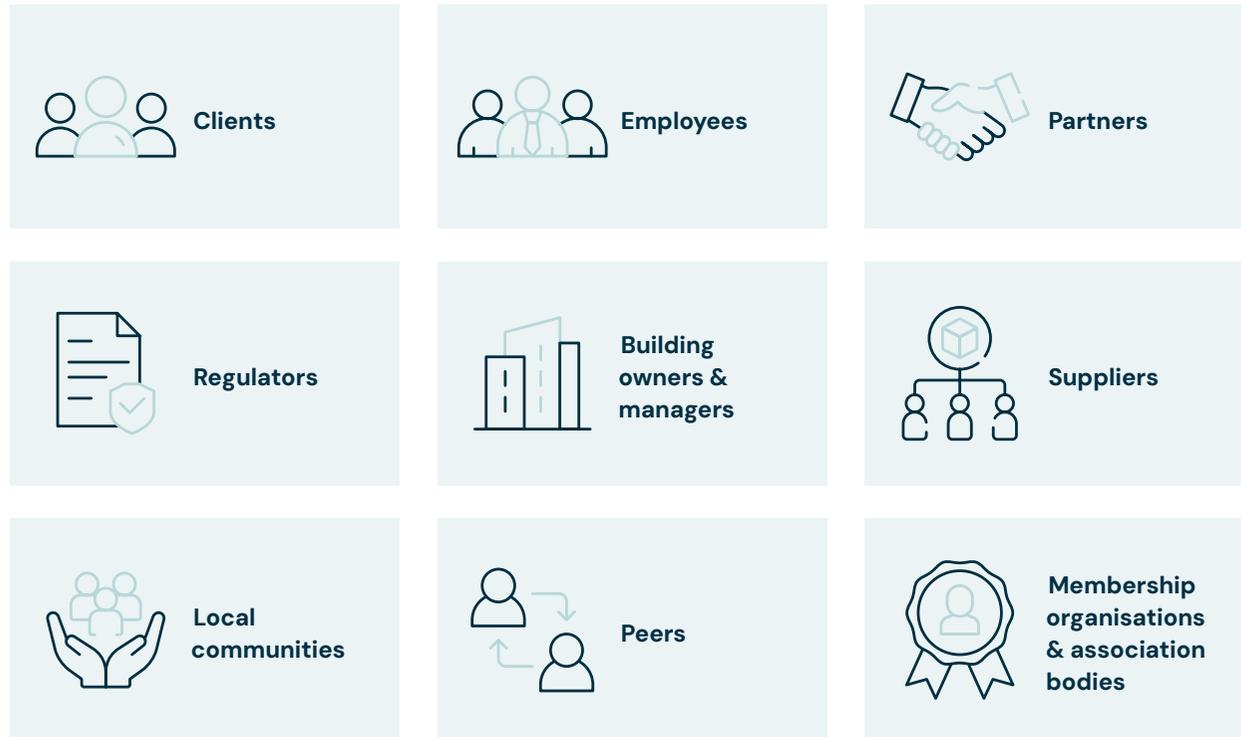
As this is our first Net Zero Transition Plan, we will conduct more in-depth analysis of how to finance the transition. Feasibility studies will assess emerging technologies and cost implications, enabling us to embed net zero into financial planning. We view net zero as a business opportunity, rather than a cost, and will be planning with this mindset.

Engagement Strategy



Freeths' key stakeholders

Freeths seeks to understand and respond to the needs and expectations of its stakeholders, while recognising wider social and environmental responsibilities. Our key stakeholders are identified as:



The Responsible Business team and RBC will ensure that all relevant stakeholders' views and needs are considered as required in the delivery of our Net Zero Transition Plan. Freeths acknowledges the stakeholder groups relevant to the TPT Disclosure Framework and these have been listed within the table in Appendix 2.



Approaches to engaging stakeholders

Achieving our net zero goals will require active collaboration across our stakeholder groups. Engagement approaches are therefore tailored to reflect the nature of each relationship and the level of influence or impact each stakeholder has on our transition. We will continue to adapt our engagement methods in response to direct and indirect feedback to ensure progress towards our targets remains on track.

Suppliers play a critical role in our transition, given their significant contribution to our

Scope 3 emissions. We define key suppliers as those that collectively account for approximately 70% of our Scope 3; Category 1 emissions, and therefore have the greatest impact on our overall carbon footprint. These suppliers will be prioritised for more focused and structured engagement. Other suppliers that do not meet the threshold for key suppliers will continue to be engaged in a proportionate way and are considered lower risk. These will require only minimal engagement, although they will be monitored periodically or if any concerns arise.



Clients

Clients are engaged through established channels to share progress on our Net Zero Transition Plan and wider Responsible Business commitments.

Client data requests are supported, disclosure requirements are met and collaboration takes place where opportunities exist to advance shared sustainability goals.



Regulators

Risk and Compliance and Responsible Business teams ensure firmwide policies and processes remain aligned with applicable legislation, regulatory guidance and emerging climate-related requirements.



Partners & employees

Regular updates provided through internal communication channels to maintain awareness, engagement and support behaviour change.

Targeted training delivered to teams and individuals with responsibilities under the Net Zero Transition Plan.

Performance KPIs and incentives embedded for relevant teams and individuals to support progress against net zero goals.



Suppliers

Suppliers are engaged to improve the consistency, accuracy and completeness of the emissions and sustainability data we receive across our value chain.

Insights and good practice are shared to support supplier decarbonisation and encourage innovation.

Approaches to engaging stakeholders



Local communities

We are committed to making a positive contribution in our local communities and being open about ambitions, learnings and challenges. By working collectively with others, we believe we can help accelerate the transition at the scale required.



Building owners & managers

We maintain open communication with landlords and managing agents to ensure they understand our commitment to net zero.

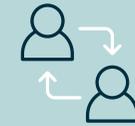
We are proactive and attend tenant meetings to identify opportunities for collaboration with our landlords to improve our premises' energy efficiency.



Membership organisations & association bodies

We will seek to collaborate to share insights, contribute to discussions and learn from other members.

These networks support our ability to benchmark progress, align our Net Zero Transition Plan with wider industry expectations and contribute to sector-wide decarbonisation initiatives.



Peers

We seek to engage with peers across the legal sector to exchange insights, explore potential collaboration and understand emerging sector-wide challenges and solutions.

Engaging our supply chain

We appreciate that engaging our supply chain will be a demanding process and will require new ways of working. To strategically plan our supplier engagement, we have conducted a Supplier Maturity Assessment to understand the biggest contributors to our footprint.

Supplier Maturity Assessment

A Supplier Maturity Assessment was conducted to understand the biggest carbon emission contributors to our footprint. The aim of this review was to categorise suppliers according to their sustainability maturity to help Freeths provide the most relevant engagement to support sustainability education and upskilling. This will be a key step in the sustainability journey, to improve Scope 3 data quality and ultimately to provide the insight to support data-led supply chain decarbonisation.

We have reviewed the current top 13 suppliers, collectively responsible for 68% of the total purchased good and services emissions. Three suppliers within the top 10 are associated with one-time contractual arrangements related to office fit-outs and refurbishment projects. Consequently, an additional three suppliers have been further analysed to facilitate comparative evaluation with future suppliers.

Maturity scoring:

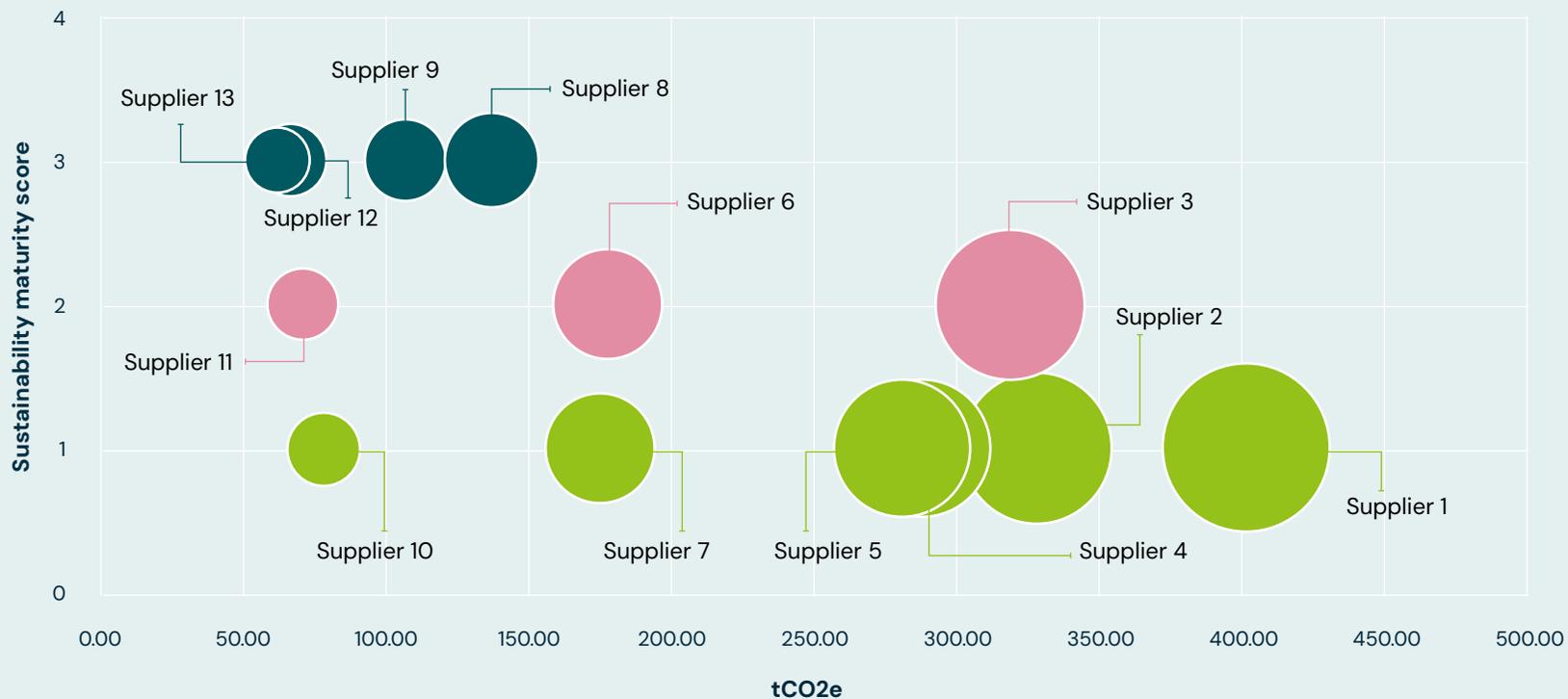
- 1 (high) – Supplier is well advanced on their sustainability journey, with clear strategies, targets and disclosures.
- 2 (medium) – Supplier is making progress but may have limited public disclosure or strategy details.
- 3 (low) – Supplier is at the start of their sustainability journey or does not publicly disclose relevant information.

The majority of Freeths' top suppliers have started their own net zero journeys, with many having set net zero targets and had these approved by SBTi. This gives us confidence that our current supplier selection process is working well. However, there are some suppliers with net zero targets, but little public disclosure of the strategies that will be employed to reach their goals. We need to ensure that these companies are on track to achieve the targets they have set and will be able to meet these goals.



The graph below indicates the emissions attributable to each supplier and the sustainability maturity score received. The size of the bubble corresponds with the quantity of emissions they are responsible for within Freeths' supply chain, while the colour indicates the sustainability score. Suppliers positioned toward the bottom-left of the graph are the best performers, combining high sustainability maturity with a smaller emissions footprint, whereas those toward the top-right have lower maturity and higher emissions, highlighting priority areas for engagement. This graph is supplemented with a summary table, which provides more detail on the sustainability initiatives they have implemented to date.

Sustainability maturity of top 13 suppliers



Sustainability maturity score



Supplier	tCO2e	% of PG&S footprint	Maturity ranking	Supplier type	Notes
Supplier 1	401.50	11.02%	1	Computer, electronic and optical products; Computer programming, consultancy and related services.	Advanced level of sustainability and net zero knowledge and action. SBTi approved net zero target year of 2040, and near-term targets in 2030, with strategy and governance to support this work.
Supplier 2	328.46	9.01%	1	Employment services; Computer, electronic and optical products; Food and beverage serving services.	SBTi approved net zero target year of 2050 with near-term targets in 2034. Publication of GHG emissions and robust methodology, but lacking clear strategic direction of how these targets will be achieved.
Supplier 3	319.52	8.77%	2	Services to buildings and landscape; Printing and recording services; Specialised construction works; Office administrative, office support and other business support services; Food and beverage serving services; Security and investigation services.	Net zero target of 2035, though no detail on how carbon reductions will be achieved. Data also shows an increase in emissions since the baseline year of 2021/2022.
Supplier 4	287.66	7.89%	1	Insurance, reinsurance and pension funding services, except compulsory social security.	SBTi approved net zero target of 2050 with near-term targets in 2030. Little evidence of how reductions will be achieved.
Supplier 5	281.58	7.73%	1	Specialised construction works.	Parent company Morgan Sindall with SBTi approved net zero target of 2045 and near-term targets in 2030. Evidence of governance and structure for carbon reductions to be delivered effectively through KPIs.
Supplier 6	178.16	4.89%	2	Specialised construction works.	Net zero target of 2050 with near-term target in 2030. Understanding of the requirements to reach net zero and reduce carbon emissions, amongst other ESG initiatives.
Supplier 7	175.58	4.82%	1	Specialised construction works.	SBTi approved net zero target of 2040, with near-term targets in 2030. Net zero journey mapped along with sustainability policies in place.

Supplier	tCO2e	% of PG&S footprint	Maturity ranking	Supplier type	Notes
Supplier 8	137.71	3.78%	3	Travel agency, tour operator and other reservation services and related services.	No evidence of net zero or carbon reductions initiatives, though as part of their product, they offer carbon offsetting to customers.
Supplier 9	106.86	2.93%	3	Computer programming, consultancy and related services.	Phoenix Business Solutions was acquired by Morae. No evidence of net zero initiatives.
Supplier 10	78.72	2.16%	1	Computer programming, consultancy and related services.	SBTi approved net zero target of 2041 with near-term targets in 2031. Clear governance and strategy to move forward with reductions.
Supplier 11	70.49	1.93%	2	Financial services, except insurance and pension funding.	No evidence of net zero or carbon reductions from Lexis, but their parent company RELX has SBTi approved near-term targets for 2030. Their net zero target of 2040, however, is not SBTi approved. Evidence of actions to support carbon reductions of Scope 1 and 2, but little evidence of carbon reduction actions impacting scope 3.
Supplier 12	67.23	1.85%	3	Computer, electronic and optical products; Computer programming, consultancy and related services.	ISO 14001 certification, but no evidence of net zero targets or any carbon reduction initiatives.
Supplier 13	62.11	1.70%	3	Computer programming, consultancy and related services.	ISO 14001 certification, but no evidence of net zero targets or any carbon reduction initiatives.

Supplier engagement short, medium and long-term actions

Freeths’ priority in the short-term will be to work together with suppliers to access better data quality with the aim to move from a spend-based methodology for the measurement of purchased good and services. It will involve strategic engagement of key suppliers to ensure they are on the right track, a focus on emerging hotspots such as AI, and for internal process and policies relevant to procurement activities to be updated accordingly.

Immediate and short-term (2026 – 2030)	Medium-term (2031 – 2035)	Long-term (2036 – 2040)
<p>Work with key suppliers to improve data quality</p> <p>All key suppliers to commit to net zero targets</p>	<p>All key suppliers to provide activity-based data</p>	<p>Carbon data collection is automated</p>
<p>Update Procurement Policy and Supplier Code of Conduct requirements to require disclosure of carbon data for key suppliers</p>	<p>Comprehensive review with key suppliers’ progress on net zero</p>	<p>All key suppliers are well advanced on their net zero journey and demonstrating year-on-year progress</p>
<p>1:1 engagement with key suppliers to discuss net zero</p>	<p>Extend engagement to all suppliers</p>	<p>All suppliers to have net zero targets (or equivalent)</p>
<p>Communications and training for all suppliers</p>		

Transitioning to net zero is a challenge for any business. This is why we want to support our suppliers in their journey and collectively work towards the same goal. With many key suppliers already on their own net zero journeys, open and constructive conversations will naturally be facilitated. In the coming years, it will be essential that we define our escalation process for when engagement activities do not deliver desired change. This will then be implemented into our procurement processes and policies accordingly and clearly communicated with suppliers.

We will continue to strengthen our existing procurement and supplier management practices to ensure sustainability performance is a core and consistent consideration within supplier engagement and review processes. Where progress is slower than anticipated, this will be addressed through structured and supportive conversations, using our established policies and governance frameworks. These expectations and approaches will be clearly embedded within our procurement processes and communicated transparently with suppliers.

Metrics and Targets



Freeths is aiming to achieve net zero GHG emissions by 2040 from a FY2024 baseline by reducing absolute Scope 1, 2 and 3 emissions by a minimum of 90%. This is supported by near-term targets to reduce absolute emissions in all three Scopes by 42% by 2030. Our targets have been developed following the SBTi Corporate Net Zero Standard and will be reviewed every five years at a minimum. The SBTi provides the only methodology to ensure that corporate targets are aligned with climate science.

Our approach to recalculating base year emissions will be set out within the Environmental Policy, to ensure consistency if

recalculation is triggered by significant changes in company structure (e.g., mergers/acquisitions or divestments), updates to the methodology used for calculating the base year inventory (e.g., improved emissions factors, improved data quality), or the occurrence of significant errors.

It is acknowledged that achieving net zero will be challenging, however, we believe that setting external and some further internal targets will help us stay on track. Performance against these targets is monitored through our Sustainability Governance Structure, as outlined in the Governance section of this Net Zero Transition Plan.

Net zero targets disclosure

		2030	2040
Net zero	Scope 1 and 2	42% absolute reduction from 2024 baseline	90% absolute reduction from 2024 baseline
	Scope 3	42% absolute reduction from 2024 baseline	90% absolute reduction from 2024 baseline

Net zero targets and metrics

	Scope 1 and 2	Scope 3
Metric used	tCO ₂ e	tCO ₂ e
Target objective	Reduce Scope 1 and 2 emissions by 90% by 2040	Reduce Scope 3 emissions by 90% by 2040
Interim target	Reduce Scope 1 and 2 emissions by 42% by 2030	Reduce Scope 3 emissions by 42% by 2030
Target boundary	UK operations	UK operations
Target period	2024 – 2040	2024 – 2040
Base year	FY2024	FY2024
Absolute / intensity	Absolute	Absolute
Alignment with international climate agreements	Aligned with Paris Agreement goal of limiting warming of 1.5°C pathway	Aligned with Paris Agreement goal of limiting warming of 1.5°C pathway
Alignment with science-based pathways	Science-based target aligned to 1.5°C pathway	Science-based target aligned to 1.5°C pathway
Methodology used	SBTi Net Zero Standard	SBTi Net Zero Standard

Emissions data

Greenhouse gas emissions	FY2024 (baseline) measured emissions tCO2e	FY2025 measured emissions tCO2e
Total Scope 1	313.0	270.6
Total Scope 2 (market-based)	146.5	72.3
Total Scope 2 (location-based)	163.2	138.6
Cat. 1 Purchased goods & services	3,644.9	3,584.8
Cat. 2 Capital goods	Included within category 1	Included within category 1
Cat. 3 Fuel and energy-related activities	104.6	89.4
Cat. 4 Upstream transport and distribution	63.8	11.9
Cat. 5 Waste	2.8	2.1
Cat. 6 Business travel	264.2	293.6
Cat. 7 Employee commuting	1,037.3	817.7
Cat. 8 Upstream leased assets	N/A	N/A
Cat. 9 Downstream transportation and distribution	N/A	N/A
Cat. 10 Processing of sold products	N/A	N/A
Cat. 11 Use of sold products	N/A	N/A
Cat. 12 End-of-life treatment of sold products	N/A	N/A
Cat. 13 Downstream leased assets	N/A	N/A
Cat. 14 Franchises	N/A	N/A
Cat. 15 Investments	N/A	N/A
Total Scope 3	5,117.4	4,799.5
Total Scope 1, 2 and 3 (market-based)	5,576.9	5,142.4

Carbon credits

In the short to medium timescales, we are focusing our efforts and finances on carbon reduction initiatives across our operations and value chain. As we progress towards our net zero target year, we will explore the use of high-quality carbon removal credits to address any residual emissions. The carbon credits market is evolving rapidly, and we continue to monitor developments to ensure that any future investment is made within a well-regulated framework. Our approach will prioritise transparency and credibility, ensuring that any projects we support deliver verified carbon removals and wider environmental and social benefits. We are committed to prioritising high-quality carbon removals, such as nature-based solutions and durable technological options that align with recognised best practice and deliver measurable long-term climate impact.

Governance



Freeths' Governance Structure

The RBC oversees and continually reviews the firm's approach to Responsible Business, ensuring alignment with strategic objectives and organisational values. Its remit includes overseeing sustainability and net zero initiatives, addressing emerging challenges and communicating progress across all levels of the firm. The RBC has oversight of the firm's statutory and stewardship responsibilities to take action on climate change, including compliance with Streamlined Energy and Carbon Reporting (SECR) requirements and contributing to UK net zero targets as set out in the 2019 Amendment to the Climate Change Act.

The RBC comprises the Senior Partner, Chair of the Partnership Board and B Corp sponsor, Chief Operating Officer, Chief People Officer, Director of Waste and Sustainability, Director of Risk and Compliance and the Director of Responsible Business. It reports to the Executive Board, chaired by the Managing Partner, which is responsible for firmwide strategy implementation.

The RBC also prepares an annual report for the Partnership Board. The Partnership Board is responsible for:

- Approving the firm's strategy;
- Providing oversight of the Executive Board;
- Overseeing risk and governance;
- Representing the interests of partners in significant decisions and safeguarding the firm's culture and values.



Delivery: roles and responsibilities

Coordination, consultation and engagement

Net zero action group (NZAG)

- Brings together key Business Services representatives across Responsible Business, Facilities, IT, Travel and Finance.
- Oversees operational implementation of net zero initiatives.
- Provides regular progress updates to the RBC.

Climate and sustainability advisory group (CSAG)

- Comprised of specialist sustainability lawyers and colleagues.
- Offers subject-matter expertise and guidance to advance the firm's sustainability ambitions.

Sustainability champions

- A network of colleagues active across the firm.
- Drives engagement and motivates teams to participate in sustainability initiatives.

Operational contributors

Facilities team

- Aims to reduce emissions across buildings and energy use.
- Delivers energy efficiency measures and office upgrades designed to lower emissions.
- Engages with landlords and managing agents to support net zero targets.

IT team

- Identifies and delivers IT-focused decarbonisation actions.
- Ensures technology infrastructure supports energy efficiency and waste reduction.
- Enables data reporting and digital solutions critical to net zero delivery.

Finance team

- Provides accurate reporting from financial and operational systems.
- Supplies robust and accurate data for emissions measurement.
- Ensures transparency and integrity in net zero reporting.

Internal audit and compliance

- Provides independent review and assurance.
- Supports audits, accreditations and governance processes.
- Maintains legal register of environmental legislation applicable to Freeths.

Travel provider

- Offers a centralised platform for managing business travel.
- Enables colleagues to make informed, smart travel choices aligned with net zero goals.

Buyers

- Follow relevant procurement policies to embed environmental considerations.
- Support sustainable purchasing decisions in line with the net zero plan.

See Appendix 3 for RACI matrix at an individual level. Ultimate accountability for decision making and strategic direction sits with the RBC.

Briefed and consulted

- Regulatory risk and ethics committee
- Operations board
- Staff council
- Office managing partners
- Office managers
- Preferred members consultation group
- Risk and compliance
- Operational risk committee
- Premises committee

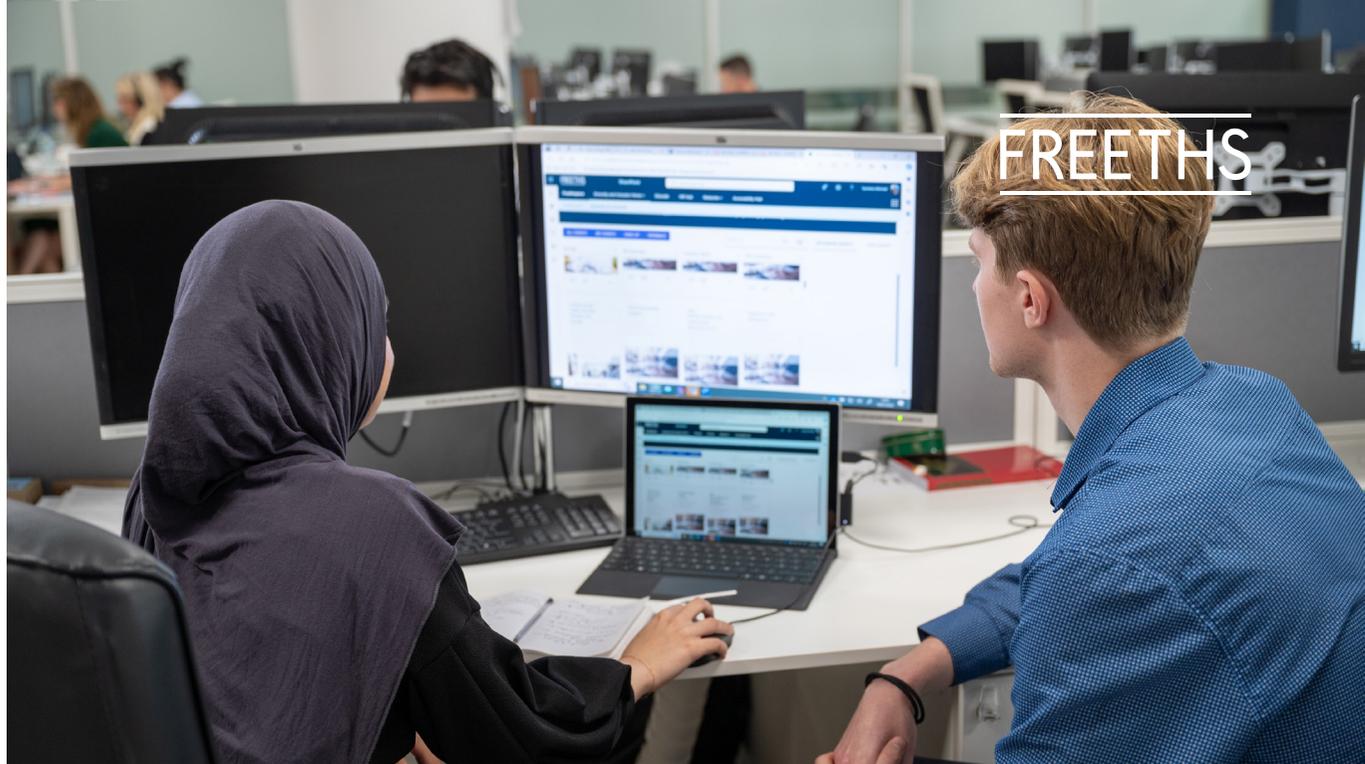
Training, awareness and capability building

The Responsible Business team will lead on sustainability training and awareness across the firm, including at leadership level. This will build on the net zero leadership sessions delivered by Planet Mark in 2025, ensuring that senior leaders understand their responsibilities, the strategic importance of net zero and the role they play in driving cultural and operational change.

Consulting with the Learning & Development team and external providers as required, the Responsible Business team will ensure that all training is tailored to the specific needs of stakeholders and teams across the business. This includes developing bespoke learning materials that reflect differing roles, levels of responsibility and exposure to sustainability-related decision making.

Incentives and remuneration

As part of our broader approach to ensuring our governance and incentive mechanisms support the delivery of our Net Zero Transition Plan, we are reviewing the updated B Corp guidance on incentives and remuneration including the mid-term requirement (by 2029) that all members of the executive team have at least one annual target linked to the firm's social or environmental performance. As part of this, we are considering how SMART social or environmental targets – such as progress on net zero and other responsible business priorities – could be adopted by our leadership team and supported by internal sustainability KPIs for colleagues who play key roles in delivering our net zero objectives.



Net zero transition plan controls and procedures

This is our first Net Zero Transition Plan disclosure, and we want to ensure that it remains relevant and accurate as we continue implementing it across the business.

We have prepared our Net Zero Transition Plan in line with the TPT Disclosure Framework as released in October 2023. This Net Zero Transition Plan was developed in collaboration with Planet Mark and relevant internal stakeholders from across the organisation. It has been reviewed by the Sustainability Manager, Maggie Stewart and approved by the Director of Responsible Business, Ben Churchill. In the coming years, we will be refining our approach and updating our Net Zero Transition Plan to ensure it remains relevant. The RBC has

oversight of this and receives frequent progress updates.

At Freeths we are committed to full transparency of our decarbonisation efforts, to mitigate any reputational, legislative or ethical risks of greenwashing. On an annual basis, we will review our emissions and report on progress towards our target(s) and our corporate-wide carbon emissions inventory. The annual governance review will ensure that:

- Progress against solutions is tracked;
- Timelines are adjusted as needed;
- Actual reductions are in line with estimated;
- The roadmap remains aligned with targets;
- Target and baseline are still relevant.

Appendix

Transition plan taskforce (TPT) alignment index

TPT disclosure elements	TPT disclosure sub-elements	Relevant section of this report	Alignment	Areas for improvement
1. Foundations	1.1 Strategic ambition	Pages 6-7	→ ←	Ensure that most up to date climate risks and opportunities are considered when defining the strategic ambition.
	1.2 Business model and value chain	Pages 6-7	→ ←	Define more in-depth changes to the business model necessary to drive the transition.
	1.3 Key assumptions and external factors	Pages 7-9	→ ←	Assess and analyse any other assumptions and external factors that are likely to become material to your organisation transition to net zero (in addition to identified high level dependencies).
2. Implementation strategy	2.1 Business operations	Pages 10-11	→ ←	Already defined decarbonisation plans. Ensure these stay up to date reflecting any changes.
	2.2 Products and services	Pages 10-11	→ ←	Conduct more in-depth review of products and services and alignment with net zero transition.
	2.3 Policies and conditions	Pages 12-13	→ ←	Ensure all supporting policies are implemented and frequently updated.
	2.4 Financial planning	Page 13	→ ←	Limited financial planning currently provided. Ensure that internal efforts are put into defining the budget for the transition.
3. Engagement strategy	3.1 Engagement with value chain	Pages 14-19	→ ←	Conduct supplier engagement activities as listed in the Net Zero Transition Plan.
	3.2 Engagement with industry	Pages 14-19	→ ←	Unlock innovative solutions by engaging with the industry.
	3.3 Engagement with government, public sector, communities, and civil society	Pages 14-19	→ ←	Initiate the engagement with governmental bodies to drive net zero transition.

■ Fully aligned
 ■ Partially aligned
 ■ Not aligned

Appendix

Transition plan taskforce (TPT) alignment index

TPT disclosure elements	TPT disclosure sub-elements	Relevant section of this report	Alignment	Areas for improvement
4. Metrics and targets	4.1 Governance, engagement, business and operational metrics and targets	Page 20	→ ←	Define specific metrics for governance, engagement, products and services to support net zero transition.
	4.2 Financial metrics and targets	Pages 20-21	→ ←	Identify further financial metrics to support the delivery of the Net Zero Transition Plan.
	4.3 GHG metrics and targets	Page 21	→ ←	Continue measuring full footprint on annual basis. Ensure that the Recalculation Policy is being followed and whenever triggered targets are recalculated.
	4.4 Carbon credits	Page 21	→ ←	Transparently disclose types of carbon credits if purchased and continue ensuring that defined approach is frequently reviewed.
5. Governance	5.1 Board oversight and reporting	Page 22	→ ←	Ensure net zero governance structure becomes well embedded into the corporate structure. If and when needed additional focused committees should be organised to address issues.
	5.2 Management roles, responsibility and accountability	Page 22	→ ←	Ensure there is a process for review of skills and competences. Explicitly state if the Net Zero Transition Plan requires partner approval.
	5.3 Culture	Pages 22-23	→ ←	Define internal communication processes and channels. Define employee value proposition.
	5.4 Incentives and remuneration	Page 23	→ ←	Explain how you incentivise the Board members and also wider employees to drive net zero transition.
	5.5 Skills, competences and training	Page 23	→ ←	Ensure that ongoing training is provided and that there is a process in place to review the competences.

■ Fully aligned
 ■ Partially aligned
 ■ Not aligned

Appendix

Key stakeholder groups

TPT stakeholder group	Key Freeths stakeholders	Definitions and role within the net zero transition plan
Value chain	Partners	Partners provide strategic direction, ensure accountability, allocate resources and champion cultural change, helping embed climate commitments into governance, client engagement and the firm’s long-term strategy.
	Employees	Members of the team on the payroll in addition to contractors and freelancers. Our employees play a role in both delivery of the Net Zero Transition Plan and holding the Management Board accountable to commitments.
	Clients	Organisations and individuals who procure legal or advisory services from Freeths. Collaboration and knowledge sharing with our clients will be essential to supporting the delivery of lower-carbon services and enabling progress towards shared sustainability.
	Suppliers	Includes downstream and upstream suppliers. Collaboration with suppliers will be crucial for accessing better quality data and finding innovative ways to reduce emissions.
	Building owners & managers	Building owners and managers from whom we rent our premises. We will be engaging with them to ensure all energy efficiency solutions are implemented across premises delivering benefits for our carbon footprint and improving the quality of their portfolio.
Industry	Peers	Competitors and peers from our industry. We would like to initiate engagement with our peers to understand an industry wide collaboration to make net zero possible. Through this engagement we hope to learn from our peers and share our knowledge.
	Association bodies	Industry association bodies that we are part of, such as the Legal Sustainability Alliance and the Chancery Lane Project. They provide a stage to consider net zero trends and impacts and set a standard for the industry.
	Membership organisations	Being part of membership organisations enables us to learn from and share our learnings with a wider audience.
Government, public sector, communities and civil society	Regulators	International and national legislative bodies that apply to our business. Regulators will set a suite of legislative requirements that must be followed and will drive national and international transition.
	Local communities	Individuals, groups and organisations located in the areas where Freeths operates. Engaging with local communities helps ensure our sustainability actions are understood, supported and deliver positive social and environmental impact.

Appendix

RACI matrix: Net zero roles and responsibilities

Role	Responsible	Accountable	Consulted	Informed
Chief Operating Officer Holds ultimate accountability for the Net Zero Transition Plan, providing strategic oversight and embedding sustainability in operational priorities.	✓	✓		
Chief People Officer Leads people and culture aspects, ensuring sustainability is reflected in engagement, behaviours and leadership development.	✓			
Director of Responsible Business Provides strategic guidance on sustainability and responsible business, aligning initiatives with firm values and stakeholder expectations.	✓			
Director, Waste & Sustainability Aligns client and sector expectations with internal delivery, ensuring external insight informs action group work and aligns with firm priorities.			✓	✓
Sustainability Manager Coordinates day-to-day delivery of the Net Zero Transition Plan, including data management, reporting and tracking progress.	✓			
National Head of Facilities Drives sustainability across premises, focusing on energy efficiency, building optimisation and operational carbon reduction.	✓			
Internal Audit & Accreditations Manager Oversees ISO standards and the EMS, ensuring governance, compliance and alignment with the Net Zero Transition Plan.	✓		✓	✓
Management Accountant Provides financial reporting and aligns systems to capture accurate data for carbon and sustainability reporting.	✓			✓
IT Operations Director Leads reduction of IT-related environmental impacts, including infrastructure efficiency, software review, hardware lifecycle management and sustainable technology procurement.	✓		✓	✓

Looking to the future

Through Freeths IMPACT we will continue to pursue our responsible business mission to make a positive difference across colleagues, communities, climate and clients.



If you'd like to comment or feedback on anything contained in this report, or our future direction, please email responsiblebusiness@freeths.co.uk