Cabinet Office

CARBON REDUCTION PLAN GUIDANCE

Notes for Completion

Where an In-Scope Organisation has determined that the measure applies to the procurement, suppliers wishing to bid for that contract are required at the selection stage to submit a Carbon Reduction Plan which details their organisational carbon footprint and confirms their commitment to achieving Net Zero by 2050.

Carbon Reduction Plans are to be completed by the bidding supplier[1] and must meet the reporting requirements set out in supporting guidance, and include the supplier's current carbon footprint and its commitment to reducing emissions to achieve Net Zero emissions by 2050.

The CRP should be specific to the bidding entity, or, provided certain criteria are met, may cover the bidding entity and its parent organisation. In order to ensure the CRP remains relevant, a Carbon Reduction Plan covering the bidding entity and its parent organisation is only permissible where the detailed requirements of the CRP are met in full, as set out in the Technical Standard[2] and Guidance[3], and all of the following criteria are met:

- The bidding entity is wholly owned by the parent;
- The commitment to achieving net zero by 2050 for UK operations is set out in the CRP for the parent and is supported and adopted by the bidding entity, demonstrated by the inclusion in the CRP of a statement that this will apply to the bidding entity;
- The environmental measures set out are stated to be able to be applied by the bidding entity when performing the relevant contract; and
- The CRP is published on the bidding entity's website.

Bidding entities must take steps to ensure they have their own CRP as soon as reasonably practicable and should note that the ability to rely on a parent organisation's Carbon Reduction Plan may only be a temporary measure under this selection criterion.
The Carbon Reduction Plan should be updated regularly (at least annually) and published and clearly signposted on the supplier's UK website. It should be approved by a director (or equivalent senior leadership) within the supplier's organisation to demonstrate a clear commitment to emissions reduction at the highest level. Suppliers may wish to adopt the key objectives of the Carbon Reduction Plan within their strategic plans.

A template for the Carbon Reduction Plan is set out below. Please complete and publish your Carbon Reduction Plan in accordance with the reporting standard published alongside this PPN.

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[1] Bidding supplier or 'bidding entity' means the organisation with whom the contracting authority will enter into a contract if it is successful.

[2] Technical Standard can be found at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991625/PPN_0621_Technical_standard_for_the_Completion_of_Carbon_Reduction_Plans__2_.pdf

[3] Guidance can be found at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991623/Guidance_on_adopting_and_applying_PPN_06_21___Selection_Criteria___3_.pdf

Carbon Reduction Plan Template

Supplier name: ………Fieldfisher LLP………..……………………………….

Publication date: …………12/06/2025……………….................................

Commitment to achieving Net Zero

Fieldfisher LLP 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.

Historic Baseline Year: 1 May 2019 – 30 April 2020	
Additional Details relating to the Baseline Emissions calculations.	
We have worked with sustainability consultant, Planet Mark, to measure our emissions data. For our original baseline year (2019/20), we measured only our UK emissions, and were unable to report on all emissions categories within that boundary, such as scope 3 purchased goods and services, due to unavailability of data. To build a clearer and more accurate picture of our carbon footprint, we have progressively expanded our scope and reporting boundary by measuring our impact across more categories and offices. In 2023/24, we measured our carbon emissions footprint across scopes 1,2, and 3 for our 15 integrated offices, including across purchased goods and services (using a combination of both spend and activity-based methodology) and employee commuting. As a result of continuing operational growth (including the addition of two new offices into our scope and reporting boundary this year) and transitioning to include more activity-based data to measure purchased goods and services emissions, we have decided to re-baseline using our 2023/24 financial year.	
Historic baseline year emissions: 1 May 2019 – 30 April 2020 **Reporting Boundary:** UK (Belfast, Birmingham, London, Manchester)	
EMISSIONS	**TOTAL (tCO_2e)**
Scope 1	0 – we were unable to measure gas consumption during this reporting period due to unavailability of data from landlord.

Scope 2	340.5 (location-based)
Scope 3 **(Included Sources)**	Total = 345.1 • Cat 1. Purchased goods and services = data unavailable • Cat 2. Capital goods = data unavailable • Cat 3. Fuel and energy related activities = 28.9 • Cat 4. Upstream transportation and distribution = data unavailable • Cat 5. Waste = 0.7 • Cat 6. Business Travel = 315.5 • Cat 7. Employee commuting = data unavailable • Cat 8. Upstream leased assets = not applicable to Fieldfisher because we do not have any upstream leased assets • Cat 9. Downstream transportation and distribution = data unavailable • Cat 10. Processing of sold products = not applicable to Fieldfisher because we do not sell any products • Cat 11. Use of sold products = we do not sell any products and there is no agreed industry framework whereby emissions associated with the use of legal services by our clients is able to be measured at this time • Cat 12. End-of-life treatment of sold products = not applicable to Fieldfisher because we do not sell any products • Cat 13. Franchises = not applicable to Fieldfisher because we do not have any franchises • Cat 14. Investments = not applicable to Fieldfisher because we do not have any investments • Cat 15. Downstream leased assets = not applicable to Fieldfisher because we have no downstream leased assets
Total Emissions	685.6

New Baseline / Current Emissions Reporting

Reporting Year: 1 April 2023 – 31 March 2024 (in 2024, Fieldfisher LLP changed its financial year end date from 30 April to 31 March 2024)

Reporting Boundary: Austria (Vienna), Belgium (Brussels), France (Paris), Germany (Berlin, Dusseldorf, Frankfurt, Hamburg, Munich), Ireland (Dublin), Luxembourg (Luxembourg), UK (Belfast, Birmingham, London, Manchester), USA (Silicon Valley).	
EMISSIONS	**TOTAL (tCO_2e)**
Scope 1	379.1 – diesel fuel, natural gas, refrigerants, fleet
Scope 2	343.4 – electricity and district heat and steam (location-based) 196.3 – electricity and district heat and steam (market-based)
Scope 3 **(Included Sources)**	Total = 12,652.3 • Cat 1. Purchased goods and services = 10,644.2 • Cat 2. Capital goods = included above where applicable • Cat 3. Fuel and energy related activities = 154.5 • Cat 4. Upstream transportation and distribution = 5.7 • Cat 5. Waste = 8.5 • Cat 6. Business Travel = 1,020.2 • Cat 7. Employee commuting = 819.3 • Cat 8. Upstream leased assets = not applicable to Fieldfisher because we do not have any upstream leased assets • Cat 9. Downstream transportation and distribution = calculated but excluded as de minimis • Cat 10. Processing of sold products = not applicable to Fieldfisher because we do not sell any products • Cat 11. Use of sold products = we do not sell any products and there is no agreed industry framework whereby emissions associated with the use of legal services by our clients is able to be measured at this time • Cat 12. End-of-life treatment of sold products = not applicable to Fieldfisher because we do not sell any products • Cat 13. Franchises = not applicable to Fieldfisher because we do not have any franchises • Cat 14. Investments = not applicable to Fieldfisher because we do not have any investments • Cat 15. Downstream leased assets = not applicable to Fieldfisher because we have no downstream leased assets

	*as part of our process for this year (FY2024/25) we have become aware that we may have downstream leased assets in one office – we will integrate this into our approach moving forward
Total Emissions	13,374.7 (location-based) 13,227.7 (market-based)

Emissions reduction targets

We are aiming for a carbon footprint reduction of 90% by 2045 and to meet our obligation to achieve Net Zero by 2050.

In pursuit of this goal, we are planning to undertake scenario planning activities to develop more detailed and/or annual reduction targets, as part of progressively aligning our approach with science-based ambitions and seeking approval of verified science-based targets.

We are also striving to have 100% of electricity purchased across our integrated firm being renewably sourced by 2030 (or earlier) to reduce our scope 2 market-based emissions to zero / de minimis level.

As part of our continued net zero strategy development (which we have also reported on in our Sustainability in Action 2024 report), other key focus areas for carbon reduction include:

- Purchased goods and services – continuing engagement and targeted due diligence regarding carbon intensive suppliers and evolving our responsible sourcing approach.
- Business travel and commuting – embedding our Sustainable Travel Principles and integrating sustainable travel options assessment into premises and operations related decision making.
- Gas – reducing gas use where feasible and continuing engagement with landlords about changes to building infrastructure and use.
- Business premises projects – integrating sustainability and carbon reduction goals and approaches into specific projects, such as office refurbishments.

Carbon Reduction Projects

Completed Carbon Reduction Initiatives

The following environmental management measures and projects have been completed or implemented since the historic 2019 baseline. When normalised to exclude new data for this reporting period, we have seen emissions reductions over our last financial year across a number of categories compared with 2022/23. Scope 1 and 2 emissions reduced by 9.5% on a headcount basis per employee, total electricity emissions decreased by 9%, waste to landfill decreased by 11%, and water emissions decreased by 47%. However, because of continuing business growth, we have seen emissions increase overall and recognise we need to continue to address this, specifically in the context of our purchased goods and services.

Strategy, governance and reporting

In 2024, we appointed a specialist Sustainability and ESG Director to lead the firm's new centralised Sustainability and ESG strategy and function (with 12 team members). This appointment is a key component of the firm's broader strategic commitment to 'embracing sustainability and ESG', development of our management and Board level governance of climate change, in conjunction with broader sustainability, issues. The Sustainability and ESG Director is responsible to the Managing Partner, is a member of our Operations Board, and works in close partnership with the Executive Committee, Country Managing Partners and Business Leaders across the network.

Our high-level strategic goal is to become Net Zero across our integrated firm-wide operations by 2045. The next phase of our climate strategy will focus, specifically, on Scope 3 and value chain data quality and emissions reduction engagement and modelling to enable us to develop emissions reduction pathways and set SBTi aligned (and then verified) targets. A key workstream will be our supplier engagement approach and collecting activity-based data on purchased goods and services.

We reported to the Carbon Disclosure Project (CDP) for the third consecutive year, disclosing information related to environmental risks and opportunities, business strategy, governance, energy efficiency, and carbon emissions. We have seen improvements across many areas of our approach and are actively seeking feedback regarding areas where we need to continue to improve. We completed our first EcoVadis submission in February 2024 by reporting on our environmental performance, amongst other topics, and, through this platform, have been engaging with clients to improve value chain collaboration on sustainability and ESG issues.

Additionally, we submitted our ESOS Phase 3 Action Plan to the Environment Agency and are taking actions to address opportunities for energy savings across our UK offices identified in the energy audit undertaken in April 2024.

Energy efficiency initiatives, program updates and environmental action

Over the past year we have substantially increased our procurement of renewable energy and now have 12 offices powered by electricity that is 100% renewably sourced, including our two largest sites in London and Manchester, which are both on REGO tariffs. We successfully moved office sites in both Hamburg and Dublin to more sustainable buildings (and this transition work has continued with our remaining offices post FY23/24). Our working pattern generally reflects an on-going hybrid approach with employees typically working in the office for three days per week and working from home for two days.

Last year, several energy optimisation initiatives were undertaken in our largest office premises in London by the landlord to address efficiency, flow, and operation (across heating and cooling systems). For example, temperature setpoint ranges were adjusted to allow for more efficient operation of the heating and cooling system, and the two primary Fieldfisher floors in the building were fitted with VAV (variable air volume system) units to ensure more efficient running of the HVAC system. In addition, in our Manchester office, we switched to using bagasse cutlery, which is made from non-wood fibres, such as sugarcane, and is new sustainable alternative to plastic single-use cutlery.

We have introduced the use of electric taxi companies for local business-related travel needs for all UK offices, where possible, as an action to reduce our scope 3 emissions. In November 2024 we also launched a sustainable travel campaign based on Sustainable Travel Principles and Guidance to provide employees with the tools to support informed decisions about overall travel impact, modes, and classes of transport to further reduce our business travel emissions.

In terms of Information Technology and hardware retention, over 1,200 monitors in the London office have at least 10 years of usage, which reduces our landfill contribution. Our IT Sustainability Taskforce also held a Sustainability Week hosting a range of events, including virtual firm-wide workshops to upskill employees on energy efficiency topics, such as, 'how to make your mobile battery last longer'; an equipment recycling initiative across London, Manchester, Birmingham, Belfast, and Dublin where employees were encouraged to recycle old technology; and a donation of 21 fully refurbished computers to a local primary school in Dublin to cover a shortage in equipment.

In 2024, our Sustainability Action Network introduced a new initiative called 'The Green Room' to provide a forum for employees to suggest ideas for new carbon reduction projects and learn about the firm's environmental progress in areas such as energy efficiency and Net Zero.

In terms of legal services, we also continue to collaborate with the UK-based Chancery Lane Project (TCLP) through our Working Group that comprises 45 lawyers and other business services professionals from across the firm's UK offices and departments. In early 2024, "Nithya's Clause" (drafted by a Director at Fieldfisher) was approved and published for use by TCLP and will support those seeking to incentivise climate change adaptation and energy efficiency improvements in product supply chain contracts.

We continue to increase our pro bono legal advice and research services with leading environmental civil society organisations by, for example, analysing the intersection of child rights and environmental rights across jurisdictions.

Upcoming projects in 2025

Over the course of 2025, we will continue to work on the following priorities:

- Our goal to transition all remaining offices to purchasing electricity that is sourced from 100% renewable energy;
- Embedding our Sustainable Travel Principles and Guidance on a firm-wide basis;
- Integrating sustainability and Net Zero goals and approaches into our office premises projects, including refurbishment and the current work to upgrade all lighting on the 7th and 8th floors of our London offices to LEDs with expected completion in 2025 (as identified in our ESOS Phase 3 Action Plan);
- Raising awareness around and actions to minimise waste to landfill / cross contamination and promote recycling, including a Dublin office campaign to educate employees on the correct way to recycle in the office, which we will aim to replicate across other offices, such as Manchester.
- IT kit donations (managed by our IT sustainability taskforce) as part of our IT's team goal to improve our sustainable disposal and reuse of equipment and contribute to bridging the digital gap by providing equipment to underrepresented groups who

need them. Our IT team donate a certain percentage of old laptops and phones resulting from any equipment refresh to charity.

- Continuing to align our reporting with industry and international standards and continuous improvement by:
  - Participating in industry-wide assessment and benchmarking, namely submitting our second EcoVadis submission in April 2025 and our fourth submission to the CDP, and seek to improve both scores;
  - For GHG emissions reporting, increasing the scope and maturity of our reporting, specifically by increasing the proportion of purchased goods and services data that is measured by activity-based methodology to improve accuracy. This will involve conducting targeted due diligence with our most carbon intensive suppliers and evolving our responsible sourcing approach as a firm (comprising a supplier code of conduct, diligence and engagement approaches).

Declaration and Sign Off

This Carbon Reduction Plan has been completed, in so far as is reasonably practicable, in accordance with PPN 06/21 and associated guidance and reporting standard for Carbon Reduction Plans.

Emissions have been reported and recorded in accordance with the published reporting standard for Carbon Reduction Plans and the GHG Reporting Protocol corporate standard[4] and uses the appropriate Government emission conversion factors for greenhouse gas company reporting[5].

Scope 1 and Scope 2 emissions have been reported in accordance with SECR requirements, and the required subset of Scope 3 emissions have been reported in accordance with the published reporting standard for Carbon Reduction Plans and the Corporate Value Chain (Scope 3) Standard[6].

This Carbon Reduction Plan has been reviewed and signed off by the Managing Partner of the firm as a duly authorised representative of the Firm's management body.

Signed on behalf of the Supplier:

Robert Shooter

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Date:……12/06/25…………….

Robert Shooter

Managing Partner

[4]https://ghgprotocol.org/corporate-standard
[5]https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting
[6]https://ghgprotocol.org/standards/scope-3-standard