



CARBON REDUCTION PLAN PPN 06/21

REV. 2026-08

WHO ARE WILLS BROS?

For over 50 years Wills Bros has steadily and sustainably grown to be a highly successful international organisation and leading Civil Engineering Contractor with over 600 employees. Throughout our period of growth, we are proud of the fact that we have never lost our sense of family values, team ethos, and community spirit. Knowing each employee personally by name and background bestows a great sense of nurture and caring from a senior management level throughout our internal employee base and extending right throughout our supply chain and out into the wider community.

This embedded sense of caring translates itself to a world class performance which we will discuss in more detail later. The commitment our Board of Directors make as we continue to grow and expand throughout the UK is to ensure that we preserve this unique culture which sets us apart. To support the continuation our cultural values, our UK Directors, Jonathan Wills and Gary Curran make a conscious effort to be very prominent, approachable, accessible and close to the workforce throughout the working year. They lead by 'walking the talk' and setting the standard. With its origins as a family run company, all at Wills Bros take pride in the standards we achieve in our projects, which culminate in repeat contracts with our clients.

Wills Bros Civil Engineering Ltd is committed to achieving Net Zero emissions in its UK operations across all Scopes by 2045 at the latest. This is aligned to the Scottish government target for Net Zero emissions which is where many of the business' projects are based.



BASELINE EMISSIONS FOOTPRINT – YEAR 2021

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.

Additional Details relating to the Baseline Emissions calculations – we have selected 2021 as our baseline reporting year as this was the first reporting period for which we have obtained external, third-party verification of our reported emissions. It was also the first year in which all identified emissions sources were included in our carbon reporting i.e. including Scopes 1, 2 and 3 and all applicable categories within Scope 3.

Emissions Scope	Category	tCO ₂ e
Scope 1	Diesel (bulk deliveries)	12,036
	Diesel (forecourt blend)	845
	Petrol (forecourt blend)	58
	Natural gas	42
	LPG	9
	Kerosene	8
Total Scope 1		12,998
Scope 2	Imported electricity (location based)	96
Total Scope 2		96
Scope 3 (mandatory sources)	Category 4: Upstream transport and distribution	1,635
	Category 5: Waste generated in operations	122
	Category 6: Business travel	123
	Category 7: Employee commuting	150
Scope 3 (additional sources)	Category 1: Purchased goods and services	26,288
	Category 2: Capital goods	617
	Category 3: Fuel and energy-related activities not included in Scopes 1 or 2	3,054
Total Scope 3		31,989
All scopes		45,083

CURRENT EMISSIONS REPORTING – YEAR 2025

Emissions Scope	Category	tCO ₂ e
Scope 1	Diesel (bulk deliveries)	2,605
	Diesel (forecourt blend)	227
	Petrol (forecourt blend)	21
	Natural gas	38
	LPG	0
	Kerosene	28
Total Scope 1		2,919
Scope 2	Imported electricity (location based)	45
Total Scope 2		45
Scope 3 (mandatory sources)	Category 4: Upstream transport and distribution	1,044
	Category 5: Waste generated in operations	150
	Category 6: Business travel	94
	Category 7: Employee commuting	128
Scope 3 (additional sources)	Category 1: Purchased goods and services	18,487
	Category 2: Capital goods	1,392
	Category 3: Fuel and energy-related activities not included in Scopes 1 or 2	691
Total Scope 3		21,986
All scopes		24,949

EMISSIONS REDUCTION TARGETS

In order to continue our progress to achieving Net Zero across all scopes by 2045, we have adopted the following carbon reduction targets:

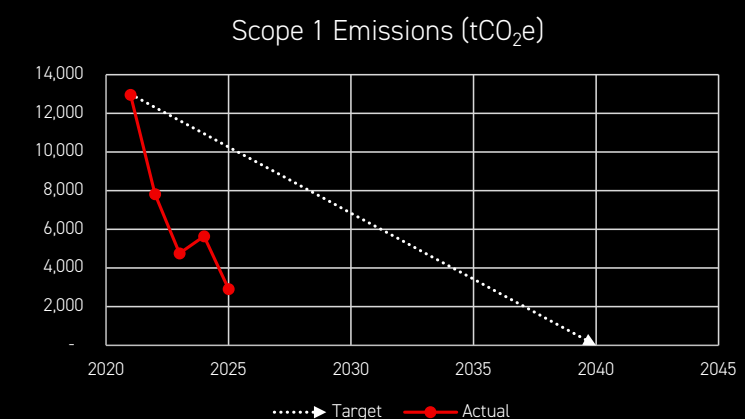
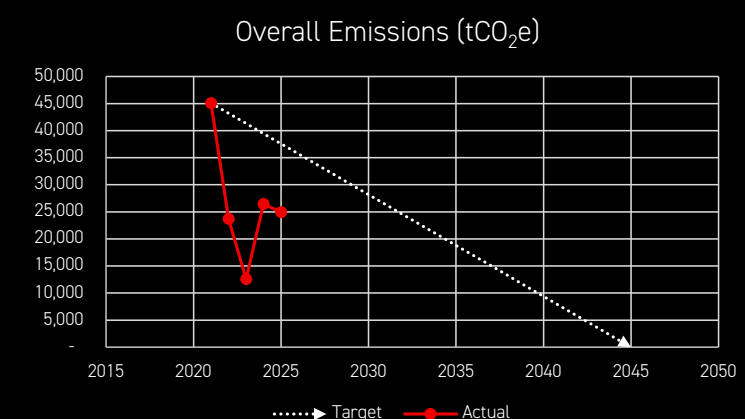
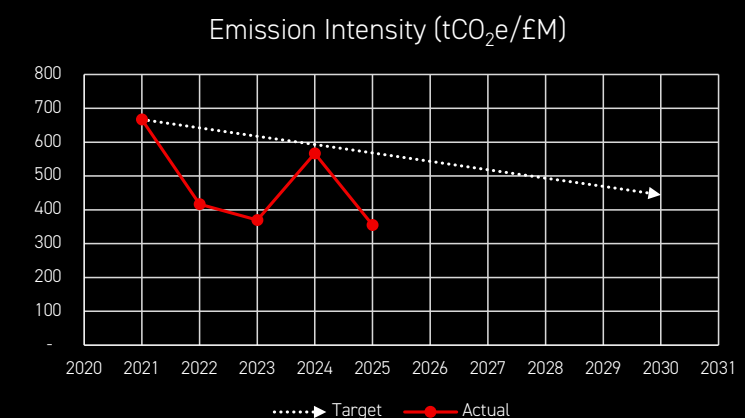
- **30% reduction in emissions intensity by 2030** – we aim to reduce our emissions intensity across Scopes 1, 2 & 3 by 30% compared to our 2021 baseline. Our baseline emissions intensity is 667 tCO₂e/£M, so our 2030 carbon intensity will be reduced to 445 tCO₂e/£M.
- **100% reduction in vehicle fleet emissions by 2030** – we aim to have a zero tailpipe emissions vehicle fleet by 2030. This equates to an absolute reduction of 903 tCO₂e in Scope 1 emissions using our 2021 baseline.
- **100% reduction in Scope 1 emissions by 2040** – we aim to eliminate Scope 1 emissions by no later than 2040. This date is largely driven by the availability of commercially viable alternatives to diesel/HVO combustion engines for large plant and machinery, which is currently expected to be hydrogen for larger plant. We will accelerate this target if technological developments allow. Elimination of all Scope 1 emissions will remove 12,998 tCO₂e from our business (based on our 2021 baseline).

PERFORMANCE

Progress against these targets can be seen in the graphs below.

Whilst progress against some of the targets set out above appears significant, the cyclical nature of our business means that it is not unusual to see large variances in some of these figures from year to year.

To provide a more accurate picture of the long-term trends in our emissions, we intend to use rolling averages to track performance in future years. This will allow us to determine if the large reductions witnessed in certain years are part of a more stable trend in emissions reduction.





WHAT WE DO NOW

- We have purchased our first fully electric 8-wheel tipper trucks.
- Electronic fuel management systems now used on all sites.
- We have trialled zero emissions battery electric excavators and wheel loaders on multiple sites.
- We have purchased hybrid excavators with increased fuel efficiencies.
- We collect and analyse telematics data for our owned plant fleet to identify inefficiencies and improve performance.
- We have invested in a number of electric portable battery packs as an alternative to small generators.
- We have expanded the use of solar for small plant such as tower lights and security cameras.
- We have undertaken Eco-Operator training, resulting in reduced plant idling times and lower carbon emissions.

IN THE FUTURE

- We will continue to increase the number of Stage V emissions-class machines without our owned plant fleet.
- We will roll out measures such as "Fuel Active" devices to improve the efficiency of our plant fleet.
- We will continue to trial alternative fuelled plant such as battery electric and hydrogen as suitable models come to market.
- We will develop KPIs for monitoring fleet performance with a focus on reducing idling times.
- We will continue the replacement of traditional diesel excavators with more efficient hybrid excavators as we invest in our plant fleet.
- We will seek to shift from diesel-powered small plant and tools to battery alternatives, where grid connections or other clean power sources are available.



Volvo Electric Tipper Truck



WHAT WE DO NOW

- We have begun switching to electric vehicles, now making up 21% of our overall vehicle fleet.
- We have purchased six electric pickup trucks.
- We have installed EV charging infrastructure at staff accommodation.
- Electric vehicle charging has been deployed on multiple sites and at our office locations.
- A salary sacrifice scheme for electric vehicles has been made available to our employees to allow them to access lower cost zero emissions vehicles.
- We have begun the roll out of vehicle trackers to our vehicles to reduce unauthorised use and improve driver efficiency.
- We have installed high quality video conferencing equipment at our main offices to reduce the need for travel.

IN THE FUTURE

- We will expand vehicle trackers to all of our fleet vehicles to help us monitor and control these emissions.
- We will continue the roll out of EV chargers to all sites/offices with grid connections.
- We will provide driver efficiency training to high mileage drivers to improve driver behaviour and reduce carbon, cost and collisions.
- We will develop a Decarbonisation Plan for Vehicles, setting maximum emissions limits for different vehicle types and updating this plan annually thereafter.
- We will develop an EV Charging Strategy for every site.



Ever Growing Fleet of Electric Vehicles



WHAT WE DO NOW

- We have deployed solar panels on multiple sites to allow locally produced renewable electricity to power vehicles and compounds.
- We have installed Air-to-air source heat pump to improve efficiency and reduce running costs.
- We have deployed solar/ battery hybrid generators on several sites to reduce generator run hours and eliminate idling emissions.
- We have installed smart energy management systems to turn off equipment when not in use to reduce generator demand.
- We have deployed energy efficient welfare and office units to reduce the energy demand in our compounds.
- We have begun switching our electricity supply contracts to renewable tariffs backed by REGOs.

IN THE FUTURE

- We will switch all electricity supply contracts to REGO back renewable electricity by 2026.
- We will expand the use of solar panels in our compounds and offices.
- We will seek to increase the use of grid connections on our sites.
- Green hydrogen powered compounds will be explored where grid connections are unavailable.



Solar Powered Site Compound, A9 Dualling Project



WHAT WE DO NOW

- We have developed low carbon solutions to reduce or eliminate carbon intensive materials such as carbon and steel in favour of lower carbon alternatives.
- We have switched from virgin materials to recycled alternatives for materials such as granite cladding.
- We hold carbon design reviews at the outset of projects to ensure early consideration of carbon reduction opportunities during the design phase.
- We utilised our mobile crusher to process site-won materials into recycled aggregates for reuse across our projects.
- We have applied PAS2080 principles on projects to deliver savings of up to 25% compared to initial project baselines.

IN THE FUTURE

- We will work with our supply chain to begin tracking supplier-specific emissions of key materials.
- We will explore the use of lower emission steel produced using electric arc furnaces/ renewable energy across our projects.
- We will develop an in-house EPD (Environmental Product Declaration) library to enable more informed decisions about material purchases.
- We will expand the use of lower temperature and Reclaimed Asphalt Pavement mixes to reduce emissions from these materials.
- We will expand the use of recycled plastics alternatives to concrete products.
- We will increase the use of prefabricated elements to reduce waste and on-site emissions associated with in-situ techniques.



FastBase Battery Foundations, Hams Hall BESS



WHAT WE DO NOW

- We have developed a Carbon Management integrated process for managing the reduction of carbon on our projects from tender through to project completion.
- We have developed a structured process to support the delivery of consistent annual carbon reporting.
- We have trained staff across a number of departments in carbon management.
- We have held Decarbonisation Workshops for major live and tendered projects.
- We have produced Carbon Risk & Opportunity register for key projects.

IN THE FUTURE

- We will produce Carbon Management Plans for all new projects which will incorporate baselines, reduction targets and regular reporting of emissions.
- We will update our quality system to integrate carbon reduction into all of our processes and procedures.
- We will continue the roll out of Carbon Literacy training to our staff.
- We will explore means of automating Scope 3 emissions reporting to improve accuracy.
- We will incorporate carbon metrics and sustainability KPIs into subcontracts for key packages of works to reduce supply chain emissions.
- We will undertake regular energy audits.



Carbon Literacy Training



WHAT WE DO NOW

- We achieved PAS 2080 accreditation in 2025, demonstrating our commitment to managing and reducing whole-life carbon across our projects through a structured, collaborative and internationally recognised carbon management approach.
- We are Achilles Carbon Reduce certified since 2021 with all identified Scope 1, 2 & 3 emissions reported and externally audited on an annual basis.
- We became a Co2nstruct Zero Business Champion in 2024, recognising our commitment to decarbonising construction and collaborating with others in the industry to drive progress.
- We have received CEEQUAL/BREEAM Infrastructure "Excellent" ratings on multiple schemes, recognising excellent performance in sustainability management in construction, including carbon reduction.
- We became a Bronze accredited Carbon Literate Organisation in 2025, demonstrating our commitment to improving carbon literacy and supporting a culture of sustainability across the business.
- Several of our team were recognised as inaugural ICE Carbon Champions in 2021 for success in carbon reduction.

IN THE FUTURE

- We will explore setting Science Based Targets and seek to have these ratified by the Science Based Targets Initiative.
- We will explore certification with the CO₂ Performance Ladder to demonstrate our commitment to decarbonisation.



Carbon Reduce Certified

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DECLARATION

This Carbon Reduction Plan has been completed 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 and uses the appropriate Government emission conversion factors for greenhouse gas company reporting.

Scope 1 & 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. 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



Jonathan Wills
Director

Education & Social Value with Every Project