

Thurston Group Limited

Carbon Reduction Plan (PPN 06/21 Compliant)

Publication Date: May 2026

Supplier Details

- **Organisation Name:** Thurston Group Limited
 - **Company Registration:** 16640239
 - **Registered Office:** Quarry Hill Estate, Horbury, Wakefield, WF4 6AJ
 - **Principal Activities:** Design, manufacture, installation and maintenance of modular buildings and associated systems
 - **Reporting Period:** 2025 (estimated, see justification below)
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Commitment to Achieving Net Zero

Thurston Group Limited is fully committed to reducing its greenhouse gas emissions and achieving Net Zero emissions by 2040 across its UK operations.

This commitment:

- Exceeds the UK Government requirement of Net Zero by 2050
- Applies to the bidding entity (Thurston Group Limited)
- Is embedded within the company's ISO 14001:2015 certified Environmental Management System (EMS)
- Is overseen at Board level through management review processes

The organisation commits to achieving Net Zero through:

- Absolute emissions reduction as the primary mechanism
 - Achieving at least 90% emissions reduction prior to offsetting
 - Continuous improvement aligned with ISO 14001 principles
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Baseline Emissions

Baseline Year: 2022

This baseline represents the first full and consistent carbon inventory developed using recognised standards and forms the reference point for emissions reduction targets.

Emissions have been calculated in accordance with:

- GHG Protocol Corporate Standard
- UK Government emission conversion factors

Baseline Emissions Summary

Scope	Emissions (tCO ₂ e)
Scope 1	344.7
Scope 2	333.5
Scope 3 (subset)	26.5
Total	704.7

4. Current Emissions Reporting (SQ 7.7 Criteria 3 & 4)

Reporting Year: 2025 (Estimated)

Emissions Summary

Scope	Emissions (tCO ₂ e)
Scope 1	750
Scope 2	260
Scope 3 (subset)	5
Total	1,015

Reporting Year Compliance and Justification

The reporting year includes estimated emissions for 2025, derived from verified historical data (2022–2024).

This approach is necessary due to:

- A period of significant organisational change, including the sale of the business out of administration in December 2025 / January 2026
- Ongoing consolidation of operational and environmental performance data following the transition to the new legal entity

In accordance with PPN 06/21 and Annex B guidance, this constitutes an acceptable justification for the use of estimated reporting data.

The organisation confirms that:

- The reporting period is compliant with the requirement to be within 12 months of the procurement start date, taking account of the 6-month grace period from the financial year end
- Estimates are based on:
 - Verified historical emissions data
 - Known operational activity levels
 - Carbon reduction initiatives implemented through the ISO 14001 EMS
- The Carbon Reduction Plan will be updated once verified 2025 data is finalised

This approach ensures transparency, accuracy, and continued compliance with procurement requirements.

5. Scope 3 Emissions

Thurston Group Limited reports Scope 3 emissions in accordance with the GHG Protocol Corporate Value Chain (Scope 3) Standard.

Included Categories

- Waste generated in operations
- Water consumption

Excluded Categories (with Justification)

The following relevant categories are not yet fully quantified:

- Business travel
- Employee commuting
- Upstream transportation and distribution
- Downstream transportation and distribution

These are recognised as relevant but are currently excluded due to:

- Data availability limitations
- Ongoing development of reporting systems
- Post-administration restructuring impacts

Scope 3 Improvement Plan

Through its ISO 14001 EMS, Thurston Group Limited will:

- Implement enhanced data capture processes
- Undertake supplier engagement to collect emissions data
- Introduce business travel monitoring systems
- Expand Scope 3 reporting coverage over time

This approach aligns with both PPN 06/21 requirements and GHG Protocol best practice.

6. Emissions Reduction Targets

The organisation has established the following targets:

- Net Zero: 2040
- Interim target: 50% reduction by 2030 (against baseline)
- At least 90% absolute emissions reduction prior to offsetting

Targets are managed through the ISO 14001 EMS using a Plan–Do–Check–Act (PDCA) approach and are reviewed annually at Board level.

7. Carbon Reduction Projects

Completed / Ongoing Initiatives

- Certified ISO 14001 Environmental Management System
- Introduction of electric material handling equipment
- Installation of energy monitoring and smart metering systems
- Waste minimisation and recycling programmes
- Integration of Life Cycle Assessment (LCA) principles
- SECR-aligned emissions reporting

Planned Initiatives

- LED lighting upgrades across operational sites
- HVAC optimisation and efficiency improvements
- Transition to renewable electricity tariffs
- Solar PV feasibility and deployment
- Fleet electrification programme
- Supplier engagement on carbon reduction

All initiatives are managed through EMS processes ensuring measurable performance improvement.

8. Environmental Management Measures in Contract Delivery

Thurston Group Limited applies structured and auditable environmental controls to all activities through its ISO 14001-certified EMS.

For NHS and public sector contracts, the organisation will:

- Apply low-carbon design principles in modular construction
- Reduce waste through off-site manufacturing techniques
- Implement project-specific waste management and recycling plans
- Select materials with lower embodied carbon where practicable
- Monitor and improve environmental performance throughout contract delivery
- Apply lifecycle thinking in design, manufacturing, and installation

These measures ensure carbon reduction is actively embedded in contract performance.

9. Governance and Approval

Environmental performance and carbon reduction are governed through the company's ISO 14001 EMS, ensuring:

- Board-level oversight
- Defined roles and responsibilities
- Regular monitoring and reporting

- Internal audit and management review

10. Declaration and Sign-Off

This Carbon Reduction Plan has been completed in accordance with:

- PPN 06/21 and associated Technical Standard for the Completion of Carbon Reduction Plans
- The reporting standard for Carbon Reduction Plans and the GHG Reporting Protocol Corporate Standard
- UK Government environmental reporting guidance

Emissions have been reported and recorded in accordance with the published reporting standard for Carbon Reduction Plans and the GHG Reporting Protocol corporate standard, using the appropriate Government emission conversion factors.

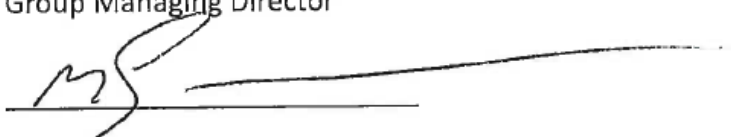
Scope 1 and Scope 2 emissions have been reported in accordance with SECR requirements, and the required subset of Scope 3 emissions has been reported in accordance with the published reporting standard.

This Carbon Reduction Plan has been reviewed and approved by the Board of Directors.

Signed on behalf of Thurston Group Limited:

Name: Matt Goff

Position: Group Managing Director

Signature: 

Date: May 2026

Public Availability

This Carbon Reduction Plan is publicly available and will be published on the Thurston Group Limited website.
