



TLT LLP Carbon Reduction Plan

FY2024 | September 2024

For what comes next
tlt.com



Contents

- Commitment to achieving net zero1
- Baseline emissions footprint.....2
- Current emissions reporting3
- Changes in methodology.....4
- Progress against emissions reduction targets.....5
- Completed, in-flight and future emission reduction initiatives7
- Declaration and sign off.....9

Commitment to achieving net zero

TLT is committed to achieving net-zero greenhouse gas (**GHG**) emissions by 2040. This has been verified by the Science Based Targets initiative (**SBTi**) and aligns with the SBTi's rigorous and science-based Net-Zero Standard.

The TLT net-zero target covers all material GHG emission categories and so does our reporting. We believe that environmental transparency and accountability are vital for our continued journey to achieving net-zero by 2040 and include all, not just required, material emissions.

Baseline emissions footprint

Baseline emissions are a record of the GHG emissions that 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.

| | | |
|--|---------------------------------|---|
| Baseline year: FY2019 (1 May 2018 – 30 April 2019) | | |
| Additional details relating to the baseline emissions calculations | | |
| <p>Our baseline emissions calculations were assessed in collaboration with Carbon Intelligence part of Accenture. FY2019 was chosen as our baseline emissions year because it was pre-Covid and represented a full, normal operational year.</p> <p>TLT operates from seven offices across the UK and reporting includes all material emissions and those required in accordance with PPN (Procurement Policy Note) 06/21:</p> <ul style="list-style-type: none"> • Scope 1 covering natural gas (heating), diesel (generator) and refrigerant gas (cooling). We do not use any fleet vehicles. • Scope 2 covering electricity. • Scope 3 covering the five specific categories required in accordance with PPN 06/21. • Scope 3 covering the three remaining material categories. | | |
| | TOTAL (tCO₂e) | Comments |
| Scope 1 | 69 | |
| Scope 2 | 465 | Market-based ¹ |
| Scope 2 | 279 | Location-based |
| Total scope 1 & 2 (market-based) | 534 | |
| Total scope 1 & 2 (location-based) | 348 | |
| Scope 3 (voluntary emissions) | 5,055 | Including purchased goods and services, capital goods and fuel- and energy-related activities ² |
| Scope 3 (required emissions) | 1,638 | Limited to business travel, employee commuting, waste generated in operations, upstream transportation/distribution and downstream transportation/distribution ³ |
| Total scope 1, 2 & 3 emissions (market-based) | 7,227 | |
| Total scope 1, 2 & 3 emissions (location-based) | 7,041 | |

¹ <https://ghgprotocol.org/scope-2-guidance>

² Categories that are material to TLT and voluntarily reported, but not required under the Cabinet Office's Procurement Policy Note (PPN) 06/21.

³ In accordance with the Cabinet Office's Procurement Policy Note (PPN) 06/21.

Current emissions reporting

Our emissions reporting aligns with our financial reporting. Until FY2024, our reporting period was 1 May to 30 April. Due to the Basis Period Reform tax changes TLT has changed its financial reporting date to 31 March. Therefore, the emissions data is presented for both an 11-month period to 31 March 2024 and a 12-month period that has used a two-fold accounting for annualisation for comparison purposes.

All material emissions are reported in tCO₂e.

| | FY2019 | FY2023 | FY2024 (11 month) | FY2024 (annualised) | % change from baseline |
|--|------------|------------|----------------------|------------------------|------------------------------|
| Scope 1 | 69 | 177 | 56 | 63 | -9% |
| Scope 2 (market-based) | 465 | 1 | 0 | 0 | -100% |
| Scope 2 (location-based) | 279 | 211 | 177 | 193 | -31% |
| Total scope 1 & 2 (market-based) emissions | 534 | 178 | 56 | 63 | -88% |
| Total scope 1 & 2 (location-based) emissions | 348 | 388 | 233 | 256 | -26% |
| Scope 3 category 1: Purchased goods and services (voluntary) ⁴ | 4,343 | 5,979 | 6,269 | 6,675 | 54% |
| Scope 3 category 2: Capital goods (voluntary) ⁴ | 593 | 405 | 519 | 737 | 24% |
| Scope 3 category 3: Fuel- and energy-related activities (voluntary) ⁴ | 119 | 29 | 24 | 26 | -78% |
| Scope 3 category 4: Upstream transportation and distribution ⁵ | 90 | 0.20 | 0.06 | 0.06 | -99.9% |
| Scope 3 category 5: Waste generated in operations ⁵ | 16 | 5 | 6 | 7 | -56% |
| Scope 3 category 6: Business travel ⁵ | 270 | 312 | 538 | 601 | 125% |

⁴ Material to TLT and voluntarily reported, but not required under the Cabinet Office's Procurement Policy Note (PPN) 06/21.

⁵ In accordance with the Cabinet Office's Procurement Policy Note (PPN) 06/21.

| | | | | | |
|---|--------------|--------------|--------------|--------------|--------------|
| Scope 3 category 7: Employee commuting and teleworking⁵ | 1,250 | 689 | 701 | 856 | -32% |
| Scope 3 category 9: Downstream transportation and distribution⁵ | 11 | 0.04 | 0.01 | 0.01 | -99.9% |
| Total scope 3 | 6,693 | 7,420 | 8,056 | 8,903 | 33.0% |
| Total scope 1, 2 & 3 (market-based) | 7,227 | 7,598 | 8,113 | 8,966 | 24% |
| Total scope 1, 2 & 3 (location-based) | 7,041 | 7,808 | 8,290 | 9,159 | 30% |

Changes in methodology

In 2024 we have continued embedding our GHG emissions reporting platform "TLT Emissions Capture". This has supported a general improvement in data collection methodology and the quality of our data.

Key methodology changes

- Scope 3 business travel emissions have been updated to include actual distance data rather than estimated distance.
- Scope 3 commuting methodology has been updated to consider the round-trip distance per person. Figures in 2023 have been recalculated and restated accordingly.
- Scope 3 emission factors for Purchased Goods & Services, and Capital Goods, have been updated to the US EPA emission factors, following the discontinuation of the EEIO emission factors in 2023. Figures for 2019 and 2023 have been restated accordingly.
- Where Life Cycle Assessment data is available for new offices, this has been incorporated into the emissions data reported, with the relevant spend being omitted from the spend based calculations.

As a result, the scope 3 emissions for FY2019 and FY2023 are restated in this year's report and supersede any scope 3 numbers in all earlier Carbon Reduction Plans.

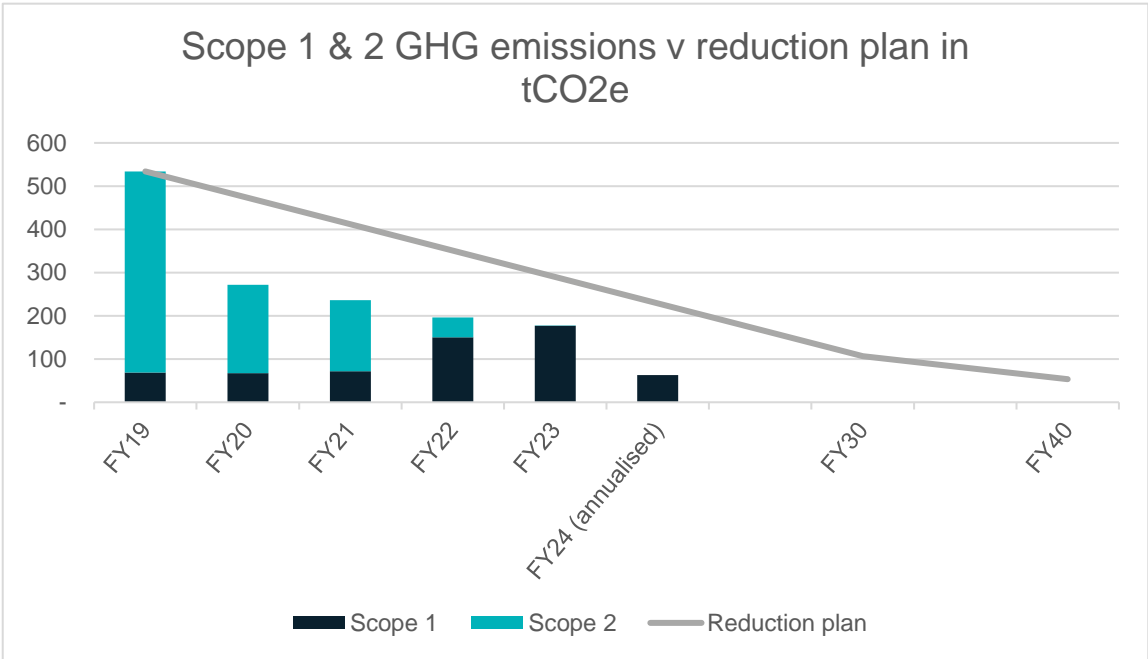
Progress against emissions reduction targets

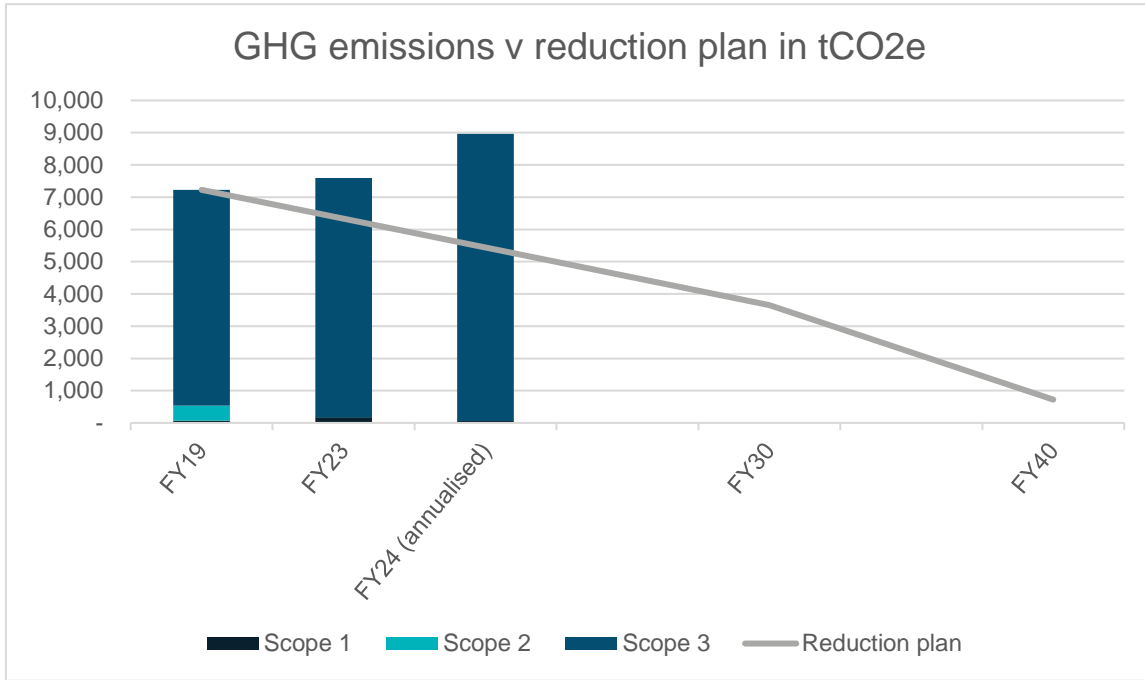
TLT's near- and long-term science-based GHG emission reduction targets are:

- Reduce absolute scope 1 and 2 (market-based) emissions 80% by FY2030 from a FY2019 base year.
- Reduce absolute scope 3 emissions 47% by FY2030 from a FY2019 base year.
- Reduce absolute scope 1, 2 (market-based) and 3 emissions 90% by FY2040 from a FY2019 base year.

Progress against the baseline in FY2019, covering the past four years, is illustrated in the graphs below. Our current progress is as follows:

- TLT absolute scope 1 and 2 (market-based) emissions have decreased by 88% as of FY2024 from a FY2019 base year, achieving our near-term target for an 80% reduction. The focus is now on maintaining this achievement and making further reductions.
- TLT absolute scope 3 emissions have increased by 33% as of FY2024 from a FY2019 base year.
- TLT absolute scope 1, 2 (market-based) and 3 emissions have increased by 24% as of FY2024 from a FY2019 base year.





Emissions in context

To measure our performance against the legal services sector we also calculate and monitor total GHG emissions intensity metrics. Considering the significant growth TLT has experienced and the type of work we do, this is a helpful way to normalise emissions data. TLT revenue has increased 82% and FTE by 44% from the FY2019 base year. TLT's absolute emissions increased by 24% in the same period. Whereas TLT's intensity emissions metric for both revenue and FTE have decreased by 31% and 22% respectively in the same period. This demonstrates that TLT absolute emissions have increased significantly less than what would be expected if no GHG emission reduction initiatives had been implemented.

| GHG intensity metrics: FY2024 (1 May 2023 – 31 March 2024) | | | |
|--|--------|--------|--------|
| Additional details: | | | |
| The intensity measurement ratios are calculated against FTE and annual revenue and is the most accurate relative measure in the legal services sector. | | | |
| | FY2019 | FY2023 | FY2024 |
| Emissions by FTE (tCO ₂ e/FTE) | 6.67 | 5.16 | 5.20 |
| Emissions by revenue (tCO ₂ e/£m) | 82.49 | 48.92 | 56.60 |

Completed, in-flight and future emission reduction initiatives

The following measures and projects have been implemented since the FY2019 baseline and were either completed or well progressed by the end of FY2024.

Our focus since establishing our sustainability strategy in 2021 has been to put in place a robust management structure and programme to ensure the net-zero programme is embedded into our day-to-day operations. Named executive board members are responsible for driving the sustainability strategy, and as part of this role, they oversee the development of a roadmap to achieve net-zero by 2040.

As of FY2024, we have achieved our near-term science-based target to reduce absolute scope 1 and scope 2 (market-based) GHG emissions. This has been driven by shifting to 100% renewable energy tariffs for our electricity; data quality improvements; active behaviour changes spearheaded by an embedded ISO 14001 system; and a shift in working practices to our TLT World model. The key is now maintaining our achievement and considering further opportunities to reduce both our location- and market-based emissions.

Scope 3 emissions make up the largest amount of TLT's total GHG emissions in the reporting year. Our plan for achieving our science-based target to reduce absolute scope 3 emissions focuses on evolving our net-zero strategy and environmental management, engaging our supply chain, and continuing to engage with our colleagues. We measure progress against this plan as part of our environmental management system.

Making our offices more sustainable

With the success of our June 2022 move into our new Glasgow space, we completed the fitout of our new Manchester office, Eden - one of the UK's most sustainable office buildings - to further embed sustainability in the places, and way, we work.

The building has both a BREEAM Outstanding rating and a 5.5 NABERS 'Design Reviewed' Target Rating, and our fit-out, which was in progress throughout FY2024, has achieved a SKA Gold rating. The building offers an enhanced environment for our colleagues while promoting TLT World – our flexible approach to working for all colleagues. To improve our scope 3 emissions, we've collected emissions data for the fitting out of Eden, to ensure the accuracy of our reporting. We also worked with contractors who share our sustainability values to maximise opportunities for sustainable design and reuse.

Moving forward, we look to continue working with our contractors to gather higher quality information around the fit-out of our offices to ensure circular concepts are used where possible.

Improvements in business travel data

It's important for us to reduce the impact of business travel, as it's the fourth largest contributor to our emissions. TLT already has a broader focus and commitment across the firm to work more flexibly and attend meetings remotely through the implementation of policies such as TLT World.

We have launched our new business travel platform, Agiito, in February 2024. The system will allow us to have improved visibility and understanding of our colleague's business travel. Using this information, we hope to influence changes in travel habits leading to the incorporation of sustainability into our travel policy.

Supply chain engagement

Our supply chain accounted for 83% of TLT's total GHG emissions in FY2024. To date, TLT has used spend-based methodology to calculate supply chain emissions, which contributes to an increase in absolute emissions as a growing business.

For this reason, our focus is to improve the data quality and use supplier information to move to a hybrid methodology (a combination of spend and supplier-based emissions) where possible. The hybrid approach is more comprehensive and a crucial step in understanding and subsequently reducing our GHG emissions.

This year we started the process by launching our supplier engagement programme. We have mapped our top 50 suppliers by spend and graded them according to maturity of information collected. We have also implemented our Supplier Sustainability Questionnaire. This questionnaire is the first step in developing a better understanding of where our suppliers are in their journey, so that we can know how best to engage them moving forward, reduce our scope 3 emissions, and help reduce our client's emissions.

Throughout FY2025 we will continue to build on this initial engagement, as we focus on working with suppliers to gather activity, supplier or product level information. We will encourage them to set environmental and net-zero targets and monitor their GHG emissions.

Colleague engagement

It's important that we build awareness and engage with our people around their impact on our net-zero journey. We run an extensive employee engagement programme that has focused on topics from net-zero to ESG, including our net-zero month campaign, 'Climate in Focus' to coincide with COP28 and Earth Hour alongside International Women's Day. This has included greater collaboration with our Equality, Diversity, Inclusion and Wellbeing team and Charity function to raise awareness, educate, and engage colleagues, on the importance of looking beyond the environmental aspects of climate change and recognise that the best solutions include wellbeing, inclusivity, and equity.

We launched our ESG Ambassadors and ESG Hub on our intranet to provide colleagues with information to integrate TLT's ESG vision and principles into every part of our day-to-day work. The hub is designed to help colleagues better understand all strands of ESG at TLT – what we are doing as an organisation, how we collaborate with our clients, and the legal services that we offer or could offer to our clients.

We continue to grow our colleague-led Sustainability Forums, made up of passionate individuals, as they support driving our firm-wide commitment at a local level through education, supporting our firm-wide campaigns and building a network of like-minded people.

We will continue running our engagement strategy and activities aligned to our net-zero pathway in FY2025 to build awareness across our people of the impact of their decisions. Moving forward, we also aim to further implement education sessions around carbon literacy.

External verification

ISO 14001:2015

It is important that we have a structured approach to environmental management. As of August 2022, TLT is ISO 14001:2015 certified. The scope of our certification was extended to include our new Birmingham and Manchester offices.

To maintain our certificate and go beyond this, we have plans to improve how we consider environmental risks, opportunities, and collaboration between our departments to enhance our environmental monitoring and GHG-emission reporting procedures.

CDP

In February 2024, TLT received a Climate Change 'B' score from CDP (formerly known as the Carbon Disclosure Project), an independent organisation widely recognised as the gold standard of corporate reporting. This maintains our score from last year, demonstrating a sustained commitment to environmental management and consistency in delivering results. Our 'B' score places us in the top third (32%) of companies that reached the 'management' level in the specialised professional services sector, ahead of the average sector performance score of C.

To ensure continuous improvement in our environmental action, we will continue with annual CDP Climate Change disclosures.

GreenCode

We achieved GreenCode Certification, an environmental accreditation that assesses organisations across environmental and sustainability criteria, demonstrating our knowledge in the principles of sustainability and that we have applied them within the firm.

EcoVadis

We have disclosed our ESG data to EcoVadis and received a silver rating in September 2023. This is an additional means to enable us to monitor our performance and convey progress from a universally recognised ESG ratings provider’s platform, which includes environmental sustainability. This will continue to be renewed annually.

Declaration and sign off

This Carbon Reduction Plan has been completed in accordance with PPN 06/21, and the 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 standard⁶ and uses the appropriate government⁷, IEA⁸, EPA⁹, GaBi¹⁰, industry¹¹ and AIB¹² emission conversion factors for GHG company reporting.

Scope 1 and scope 2 emissions have been reported in accordance with Streamlined Energy and Carbon Reporting (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) Standard¹³.

Limited assurance on scope 1, 2 (market-based) and 3 GHG emissions was carried out on FY2019, FY2023 and FY2024 in accordance with International Standard on Assurance Engagements on Greenhouse Gas Statements (ISAE 3410).

This Carbon Reduction Plan was reviewed and signed off by the Executive Board of TLT LLP on 26th September 2024.

Signed on behalf of TLT’s Executive Board by:



John Wood
Managing Partner

⁶ <https://ghgprotocol.org/corporate-standard>
⁷ [Government conversion factors for company reporting of greenhouse gas emissions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/conversion-factors-for-company-reporting-of-greenhouse-gas-emissions)
⁸ [Emissions Factors - Data product - IEA](#)
⁹ [Supply Chain Greenhouse Gas Emission Factors v1.2 by NAICS-6 - Catalog \(data.gov\)](#)
¹⁰ [Product Sustainability Data Search | Sphera \(GaBi\)](#)
¹¹ [Cornell Hotel Sustainability Benchmarking Index – Greenview](#)
¹² [European Residual Mix | AIB \(aib-net.org\)](#)
¹³ <https://ghgprotocol.org/standards/scope-3-standard>

tlt.com/contact

[Belfast](#) | [Bristol](#) | [Edinburgh](#) | [Glasgow](#) | [London](#) | [Manchester](#) | [Piraeus](#)

TLT LLP and TLT NI LLP (a separate practice in Northern Ireland) operate under the TLT brand and are together known as 'TLT'. Any reference in this communication or its attachments to 'TLT' is to be construed as a reference to the TLT entity based in the jurisdiction where the advice is being given. TLT LLP is a limited liability partnership registered in England & Wales number OC308658 whose registered office is at One Redcliff Street, Bristol, BS1 6TP.

TLT LLP is authorised and regulated by the Solicitors Regulation Authority under ID 406297.

In Scotland TLT LLP is a multinational practice regulated by the Law Society of Scotland.

TLT (NI) LLP is a limited liability partnership registered in Northern Ireland under ref NC000856 whose registered office is at River House, 48-60 High Street, Belfast, BT1 2BE.

TLT (NI) LLP is regulated by the Law Society of Northern Ireland under ref 9330.

TLT LLP is authorised and regulated by the Financial Conduct Authority under reference number FRN 780419. TLT (NI) LLP is authorised and regulated by the Financial Conduct Authority under reference number 807372. Details of our FCA permissions can be found on the Financial Services Register at <https://register.fca.org.uk>

