



Carbon Reduction Plan

Supplier name: CDER Group Limited

Publication date: 8th June 2026

Commitment to achieving Net Zero

CDER Group is committed to achieving Net Zero emissions by 2050.

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.

Baseline Year: 2021	
Additional Details relating to the Baseline Emissions calculations.	
<ul style="list-style-type: none"> ▪ 2020 is the earliest period for which reliable and comprehensive emissions data is available for CDER Group; however, during this period our business operations were significantly, untypically low due to the impact of COVID-19. Therefore, we have opted to use 2021 as the most appropriate baseline reporting year to work from ▪ as CDER’s fleet is comprised of vehicles under operating leases and subcontractor ownership, we have retrospectively revised our baseline year reporting under Scope categories – switching fleet emissions from Scope 1 to Scope 3. 	
Baseline year emissions:	
EMISSIONS	TOTAL (tCO₂e)
Scope 1	n/a
Scope 2	34.46
Scope 3	338.32
Total Emissions	372.78

Current Emissions Reporting

Reporting Year: 2025

Additional Details relating to the emissions calculations.

- Scope 2 emissions decreased slightly from 37.4 tCO₂e in 2024.
- Scope 3 emissions data was expanded to cover temporary replacement short term hires for vehicles under repair/service in 2025. The calculation reintroduced leaver vehicles omitted from the 2024 calculation, which retrospectively calculated to 294.32. This returned an increase from previous year reporting figure.

EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	n/a
Scope 2	31.72
Scope 3	347.97
Total Emissions	376.69

Emissions reduction targets

In order to continue our progress to achieving Net Zero, we adopted the following carbon reduction targets in our baseline year, 2021:

- achieve a 100% reduction of tCO₂e emissions by 2050 across all relevant Scopes
- achieve a 50% reduction of tCO₂e emissions by 2035 across all relevant Scopes
- achieve a 30% reduction in tCO₂e emissions by 2027 across all relevant Scopes.

2025 progress update:

- following a revision to the calculation used to monitor Scope 3, a review of the data collated for the baseline figure is underway with an expected increase. An update to this report to reflect the current progress will follow in due course. This is anticipated to reflect a reduction in-line with target.

Carbon Reduction Projects

Completed / ongoing carbon reduction initiatives

Strategic initiatives

Our commitment to protecting the environment is evidenced by our ISO 14001 Environmental Management Systems accreditation (*see right*). CDER moved to a new ISO UKAS accredited accrediting body in May 2024.

Furthermore, we are currently preparing for alignment to ISO 50001 Energy Management Systems standards.

We have a robust Environmental Policy and Carbon Reduction Strategy, assessed annually by our CEO, Nick Tubbs, and our HSEQ Management Team.

All CDER Group employees are required to read these on our company intranet. We also distribute updates of the Policy to staff via email and newsletters, in line with changes in environmental and carbon-related legislation. Our employees have a duty to co-operate with the company in complying with our policy requirements and to report incidents that may cause harm to the environment as specified in the CDER Group Employee Handbook.



Scope 2 carbon reduction initiatives

- our move to Amazon Web Services for data-centre operations provides energy efficiency improvements of over 37% compared to our previous provider
- where auto power down is not enabled, signage is used by photocopiers, mail room equipment and air conditioning and heating units reminding staff to turn them off after use
- automatic movement sensor lighting installed
- PCs and monitors not in use are all shut down at night; in the case of servers, monitors are turned off
- chargers for phones and other handheld units are switched off or removed from sockets
- all heaters have adjustable thermostats
- all appliances are energy efficient (e.g. our fridges are in the A++ band for efficiency making and we have eco-friendly hand dryers in toilets)
- LED lighting – as part of all property refurbishments since 2019, we have replaced incandescent and similar lighting with low energy equivalents
- all appliances are serviced on a regular basis to ensure maximum efficiency.

Scope 3 carbon reduction initiatives

- **hybrid and electric vehicles:** In-line with our parent company, BREXA Holdings Inc., pledge to ensure 70% of all vehicles used by 2030 will be 'Next-Generation', CDER Group launched a programme to switch 100% of our enforcement agent vehicle fleet from diesel to petrol/ hybrid/ EV. Having commenced in 2024, the remaining diesels are due to be replaced in 2026. Expansion

of petrol hybrid, petrol hybrid electric (PHEV) form part of the initial programme as these are easier to source currently and are not subject to the same EV infrastructure limitations. To this end, we allocated a 50% proportion of our vehicle fleet budget in 2024/25 and 2025/26 and have been working with suppliers to source appropriate vehicles. The percentage of our fleet that is hybrid or electric is now monitored and reported on a monthly basis

- **meeting Euro-6 emission standards:** 100% of our vehicle fleet already meets Euro-6 emission standards and our IT system is configured to record adherence to these standards and prevent the issue of any warrants to EAs unless using a Euro-6 compliant vehicle
- **we monitor vehicle emissions:** We use the FORS FMS data management portal to measure fuel consumption and fleet incidents to understand where efficiencies can be made, and emissions reduced. Recording data is key for us to baseline performance and identify where efficiency improvements can be made across a fleet
- **reducing the need for use of vehicles, customer visits and vehicle removals** – we limit the level of emissions we generate by maximising collections at Compliance Stage. This is achieved through early tracing and a proactive multi-contact strategy, reducing the need for EA visits using vehicles and the risk of having to remove the customer’s vehicles using HGV removal trucks
- **optimised routing** – our IT system ensures cases are issued to Enforcement Agents nearest to customer addresses and uses historic records and third-party intelligence to determine best-time-to-visit, maximising success and minimising distance travelled. Despite a 60% increase in visits made daily since 2018, our smart -routing solution has delivered an 18% reduction in fuel consumption
- **FORS Silver accreditation** – as part of our accreditation, all our drivers are required to complete regular ‘smart-driver’ training, reducing fuel consumption and CO² emissions. This is aided by our monitoring of driver behaviour and vehicle performance by our vehicle telematics (linked to our Fleet Management system)
- **Our Supplier Policy** – we ensure that environmental and carbon reduction initiatives are a standard agenda item in our contract performance review meetings with our suppliers. As a minimum, our suppliers must commit to implementing policies/processes/plans compliant with our own.



Although we are not currently tracking Scope 3 emissions relating to staff commuting to offices, we nonetheless have implemented a range of initiatives to reduce the carbon impact of this. By way of example, this includes:

- implementing video conference facilities across all sites to minimise travel for meetings
- encouraging home working – where able, our office based staff are now able to work from home at least 2 days a week
- interest free train and cycle loans
- cycle and walk to work initiatives
- a blanket ban on all personal deliveries (Amazon etc.) to our offices.



Planned carbon initiatives

- **Carbon Reduction Working Group:** the group currently consists of the Senior Management Team, which include our CEO and Board of Directors, as well as our Head of Audit & Compliance, with matters covered during monthly Management Review meeting. A revision to the group by the end of 2027 will include the Social Value Manager and a consultant from our environmental specialist. Its purpose to monitor and direct our organisational strategy towards carbon reduction. The Group will assess our progress against our carbon reduction targets and set out plans for future initiatives. They will also assess new relevant technologies to ascertain whether these can feasibly be implemented in our business operations
- full implementation of ISO:50001 (Energy Management System) by end 2027
- continued expansion of our hybrid and electric vehicle fleet
- switch to using renewable energy providers for our offices in London, Bolton and Darlington
- work with our facilities management partners to install Building Management Systems to automatically control energy consumption
- roll out of a Carbon Reduction Awareness course on our online training platform, LearnUpon
- appointing a Carbon Reduction Agent who will be responsible for collating and analysing our emissions under each Scope, and reporting this to the Board to guide strategic decisions – by 2027
- communications to *office* employees throughout the year on means to reduce energy consumption.

As set out in this Carbon Reduction Plan, we have robust strategies to reduce the volume of carbon that we emit from our operations. We will augment this by implementing a concurrent Carbon Offsetting Plan. This will include, most notably, financially supporting Forest Carbon Limited, who have planted over 10.5 million trees in the UK, capturing 2,000,000 tonnes of CO₂ to date.

Declaration and Sign Off

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](#).

This Carbon Reduction Plan has been reviewed and signed off by the CDER Group Board of Directors.

Signed on behalf of the Supplier:



Carole Kenney | Director, Welfare, Road Traffic & Road User Charging

Date: 8th June 2026.