



Fuel Storage Solutions

Marin House, 19 West Lane
Thornton, Bradford, BD13 3JB

Carbon Reduction Policy

Location: Head Office and Off-Site Engineering Locations

Effective Date: 1 October 2026

Review Date: 30 September 2027

Version: 1.0



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Registered in England & Wales: 04407127 | VAT Registered Number: 796 6526 68



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1. Policy Statement

Fuel Storage Solutions Limited ("FSS") recognises the importance of reducing greenhouse gas emissions and minimising the environmental impact of our business.

As a UK SME operating within the fuel storage, fuel systems and engineering sector, our activities involve office operations, engineering activities, company and employee travel, procurement of materials and equipment, and work undertaken at customer sites.

We are committed to reducing the carbon emissions associated with our operations through practical, measurable and continually improving actions.

We will prioritise avoiding and reducing emissions at source, rather than relying on carbon offsetting or other compensatory measures. We will make environmental claims only where they are accurate, clear and supported by appropriate evidence.

This policy supports our wider environmental and sustainability objectives and our commitment to contributing to the UK's transition towards a lower-carbon economy.

2. Our Carbon Reduction Principles

Our approach is based on the following principles:

- **Measure** – We will establish and maintain an appropriate record of our energy use and greenhouse gas emissions.
- **Reduce** – We will identify the principal sources of emissions within our control and take proportionate action to reduce them.
- **Improve** – We will consider carbon reduction when making decisions about vehicles,



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buildings, equipment, materials, procurement, travel and business processes.

- **Engage** – We will involve employees, suppliers and contractors where their actions can contribute to carbon reduction.
- **Be transparent** – We will report progress accurately and will clearly identify any assumptions, estimates, exclusions or limitations in our carbon information.
- **Continually improve** – Our carbon reduction programme will be reviewed regularly and updated as technology, business requirements and available data develop.

3. Measuring Our Carbon Footprint

We will progressively improve our measurement of greenhouse gas emissions arising from our operations.

Our initial focus will be on:

- **Scope 1 emissions**, including fuel used in company-owned or controlled vehicles, heating and other directly controlled fuel consumption and relevant refrigerant emissions.
- **Scope 2 emissions**, principally purchased electricity and other purchased energy.
- **Relevant Scope 3 emissions**, where data is reasonably available and proportionate to the size and nature of our business, including business travel, employee travel, purchased goods and services, waste and other significant supply-chain emissions.

Where appropriate, emissions will be calculated using the latest UK Government greenhouse gas reporting conversion factors. These factors are published annually and are suitable for UK organisations of all sizes.



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Where accurate activity data is not available, reasonable estimates may be used and the basis of those estimates will be recorded.

We will seek to improve data quality over time so that our carbon footprint becomes increasingly consistent, transparent and meaningful.

4. Carbon Reduction Commitments

4.1 Energy Use

We will seek to reduce energy consumption across our offices, workshops and other facilities by:

- monitoring electricity and heating consumption;
- avoiding unnecessary heating, lighting and equipment use;
- using energy-efficient lighting and equipment when replacements are required;
- considering building energy-efficiency improvements;
- using controls such as timers, thermostats and automatic lighting where practical;
- considering renewable electricity or renewable energy solutions where commercially and operationally appropriate.

Energy efficiency will be considered when purchasing or replacing significant equipment.

4.2 Company Vehicles and Engineering Fleet

Our engineering activities require travel to customer and project sites. We recognise that vehicle fuel use may therefore represent a significant source of operational emissions.

We will seek to reduce emissions through:

- effective route planning and scheduling;
- combining site visits where practicable;
- avoiding unnecessary journeys through remote meetings and remote technical



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support where suitable;

- encouraging efficient driving practices;
- monitoring vehicle fuel consumption where practical;
- considering lower-emission, hybrid and electric vehicles when vehicles are replaced;
- evaluating the suitability of charging infrastructure for company operations;
- selecting vehicles that are appropriate for operational requirements while avoiding unnecessary emissions.

Operational safety, vehicle capability and the requirements of customer sites will remain important considerations when determining suitable fleet options.

4.3 Business Travel

We will reduce unnecessary business travel where reasonably practicable.

Employees will be encouraged to use:

- telephone and video conferencing;
- remote meetings;
- digital collaboration tools;
- public transport or rail where practical;
- shared or combined travel arrangements where appropriate.

Where travel is necessary, the most practical lower-emission option will be considered.

4.4 Engineering and Site Operations

We recognise that engineering work can involve travel, plant, tools, equipment and materials.

Where practical, we will:



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- plan work efficiently to minimise repeat visits;
- consolidate deliveries and site attendance;
- select appropriately sized plant and equipment;
- avoid unnecessary idling of vehicles and equipment;
- maintain equipment to ensure efficient operation;
- consider lower-carbon alternatives where they meet technical, safety and performance requirements;
- minimise material waste through accurate planning and measurement.

Carbon reduction will be considered alongside health and safety, engineering standards, quality, reliability, customer requirements and cost.

4.5 Materials and Procurement

We will seek to reduce the carbon impact of the materials and services we purchase.

When reasonably practicable, procurement decisions will consider:

- product durability and expected service life;
- repairability and reuse;
- recycled or recyclable content;
- packaging;
- transportation requirements;
- supplier environmental performance;
- opportunities to reduce material consumption;
- opportunities to source locally or regionally where this provides an appropriate overall benefit.

We will work with key suppliers where there are realistic opportunities to obtain better environmental information or lower-carbon alternatives.



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We will not select a product solely on the basis of an environmental claim without considering its technical suitability, whole-life impact and supporting evidence.

4.6 Waste and Circular Economy

We will apply the waste hierarchy wherever reasonably practicable:

Prevent → Reduce → Reuse → Recycle → Recover → Dispose

We will seek to:

- prevent unnecessary waste;
- reuse materials and equipment where safe and appropriate;
- segregate recyclable waste;
- reduce unnecessary packaging;
- use digital documents and records where appropriate;
- ensure waste is handled and disposed of responsibly.

Waste data will be monitored where practical to identify opportunities for further improvement.

4.7 Digital and Office Practices

We will consider the energy and resource requirements of our office and digital operations.

Measures may include:

- reducing unnecessary printing;
- using digital document management;
- switching off equipment when not required;
- reviewing the energy efficiency of IT equipment;



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- extending the useful life of equipment where appropriate;
- responsibly recycling electrical and electronic equipment.

5. Supply Chain and Contractors

We recognise that a proportion of our environmental impact occurs outside our direct operational boundaries.

Where proportionate to the procurement decision, we will consider suppliers' environmental practices, relevant environmental certifications, carbon information and reduction initiatives.

Contractors working on our behalf will be expected to comply with our applicable environmental requirements and site controls.

We will encourage suppliers and contractors to identify practical opportunities to reduce emissions associated with their activities.

6. Carbon Reduction Targets

We will use our organisational carbon baseline and to develop appropriate reduction targets.

Our initial priority will be to establish reliable Scope 1 and Scope 2 emissions data and identify the principal sources of emissions. We will then set realistic and measurable reduction objectives appropriate to the size, structure and growth of our business.

Targets will be reviewed periodically to ensure that they remain relevant and meaningful.

Where business growth increases absolute emissions despite efficiency improvements, we will seek to distinguish between absolute emissions, emissions intensity and changes resulting from increased business activity.





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7. Carbon Offsetting and Carbon Removal

We recognise that offsetting or carbon removal does not replace the need to reduce emissions from our own operations.

Our priority will therefore be:

- i) Avoiding emissions;
- ii) Reducing emissions;
- iii) Improving efficiency;
- iv) Addressing residual emissions where appropriate.

We will not describe the business, products or services as “carbon neutral”, “net zero” or equivalent unless the claim is supported by appropriate evidence, a defined methodology and a credible plan.

8. Environmental Claims and Communications

We will ensure that statements made publicly about our carbon reduction activities are:

- accurate and factual;
- clear and understandable;
- supported by appropriate evidence;
- specific about what is being claimed;
- not misleading through omission or presentation;
- proportionate to the actions we have actually taken.

Where a claim relates only to part of our operations, product or service, this will be made clear.



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We will avoid vague or unqualified claims such as “green”, “eco-friendly” or “carbon neutral” unless the wording is appropriately defined and substantiated.

Our approach is consistent with the Competition and Markets Authority’s Green Claims Code and its 2026 guidance on environmental claims across supply chains.

9. Employee Engagement

All employees have a role to play in reducing the environmental impact of our business.

We will encourage employees to:

- switch off equipment and lighting when not required;
- avoid unnecessary journeys;
- drive efficiently;
- reduce waste;
- reuse materials where appropriate;
- consider environmental impacts when planning work;
- report opportunities for energy and carbon reduction.

Relevant environmental and carbon-reduction considerations will be incorporated into employee communications and training where appropriate.

10. Governance and Responsibilities

The Board of Directors has overall responsibility for this policy and for ensuring that carbon reduction remains part of the Company's business planning and decision-making.

Management will:



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- monitor relevant energy and emissions data;
- identify opportunities for reduction;
- implement agreed improvement actions;
- monitor progress against targets;
- ensure appropriate records are maintained;
- review this policy at least annually.

Employees and contractors are responsible for complying with relevant environmental procedures and supporting the Company's carbon reduction objectives.

11. Monitoring and Reporting

We will monitor appropriate performance indicators, which may include:

- annual Scope 1 emissions;
- annual Scope 2 emissions;
- selected Scope 3 emissions;
- electricity and heating consumption;
- vehicle fuel consumption;
- business mileage;
- waste volumes and recycling performance;
- renewable electricity usage where applicable;
- progress against carbon reduction actions and targets.

Where appropriate, carbon performance will be reviewed at management or Board level at least annually.

We will communicate progress honestly, including where targets have not been achieved or where data remains subject to estimation.



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12. Compliance

We will comply with applicable UK environmental legislation and relevant regulatory requirements.

Where applicable, our carbon and energy reporting will take account of relevant UK Government guidance, including the annual greenhouse gas reporting conversion factors.

FSS do not currently fall within the scope of the UK Streamlined Energy and Carbon Reporting requirements. However, if this changes it will be addressed through the Company's statutory reporting arrangements. Current UK guidance states that SECR generally applies to unquoted companies and LLPs meeting at least two of the thresholds of more than 250 employees, more than £36 million turnover and more than £18 million balance sheet total, subject to the applicable rules and exemptions.

13. Review and Continual Improvement

This policy will be reviewed at least annually and sooner where there are significant changes to legislation, business activities, technology or recognised good practice.

The Company is committed to continual improvement and will seek to strengthen its carbon management approach as better data, technologies and lower-carbon solutions become available. We will also consider

- Legislation or regulatory requirements
- FSS activities or operations
- Waste streams
- Working practices



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The next scheduled review date is **30 September 2027**.

Approved by: Katharine Barnett

Position: Finance Director

Date: 1 October 2026



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