Carbon Reduction Plan

AUGUST 2026

FRESHFIELDS

Commitment to achieving net zero

Freshfields' target to achieve net zero carbon emissions by 2050 was validated by the Science Based Targets initiative (SBTi) in July 2025. The target aligns our strategy with the Paris ambition to limit global warming well below 2°C compared to pre-industrial levels.

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: 2018/19	
We were one of the first law firms to focus on measuring and reducing our carbon emissions, reporting our footprint in 2007 and offsetting ever since. For the purposes of target setting, our baseline year is FY 2018/19. Our global carbon footprint reporting includes all Scope 1 and Scope 2 emissions with no exclusions, and all applicable Scope 3 categories (fuel and energy-related activities, waste generated in operations, business travel, employee commuting and purchased goods and services category). The footprint spans all the Firm's offices globally.	
Baseline year emissions: 2018/19	
Emissions	**Total (tCO_2e)**
Scope 1	2,136.7 tCO_2e
Scope 2	8,001.3 tCO_2e (location-based) 4,778.5 tCO_2e (market-based)
Scope 3 **(included sources)**	79,919.7 tCO_2e All categories of emissions applicable to our operations: Purchased goods and services, fuel- and energy-related activities, upstream distribution and transportation, waste generated in operations, business travel (including optional hotels), and employee commuting, and upstream leased assets. This includes all categories of Scope 3 emissions applicable to our operations.
Total (market-based)	86,835.2 tCO_2e

Current Emissions Reporting

Reporting year: 2025/26	
Emissions	**Total (tCO_2e)**
Scope 1	436.3 tCO_2e
Scope 2	5,147.3 tCO_2e (location-based) 523.4 tCO_2e (market-based)
Scope 3 **(included sources)**	50,849.0 tCO_2e Purchased goods and services, fuel- and energy-related activities, upstream distribution and transportation, waste generated in operations, business travel, employee commuting, and upstream leased assets. This includes all categories of Scope 3 emissions applicable to our operations with the exception of optional Scope 3 categories (hotels and home working) which are excluded from SBTi's target validation.
Total (market-based)	51,808.8 tCO_2e

Emissions reduction targets

Freshfields is committed to achieving net zero emissions by 2050. We have published near-term science-based targets in line with the Paris ambition to limit global warming well below 2°C. Our near-term targets and 2050 net zero target have been externally validated by the SBTi.

In January 2023, we published near-term science-based targets on carbon emissions. In 2025, we published a long-term 2050 net zero target and, in March 2026, we updated and extended our near-term science-based targets from 2027 to 2030. The main difference between the previous and current near-term targets is that we have now consolidated our Scope 3 ambition into a single absolute emissions reduction target by 2030. All of our climate targets are validated by SBTi.

Our climate targets are presented below (baselined to FY 2018/19).

Near-term (2030)

- ↘83% reduction in Scope 1 and 2 emissions (buildings)
- 100% renewable electricity in all offices
- ↘43% reduction in Scope 3 emissions

  This includes:
  - ↘17% reduction in business travel emissions
  - ↘59% reduction in supply chain emissions

Long-term net zero (2050)

- ↘95% reduction in Scope 1 and 2 emissions
- ↘90% reduction in Scope 3 emissions

Freshfields sets science-based targets to:

- Play our part in maintaining global warming under 2°C
- Ensure colleagues see an authentic commitment to sustainability in the workplace
- Meet the expectations of some of our largest clients

Broader commitments

Buildings

All new offices, moves and refits to seek compliance with ambitious sustainable building standards

Waste

Landfill and disposables (in catering, hospitality and refreshment areas) phased down across our operations globally

Progress made towards our science-based targets is conveyed in our annual responsible business reports which, along with carbon assurance statements, can be found on our website under responsible business reports. We also complete annual submissions to CDP and EcoVadis.

We project that our Scope 1 and 2 emissions will reduce slightly over the next five years as our building stock increases efficiency and we roll out renewable electricity to 100 per cent. However, as our business grows, including in markets such as the USA, our Scope 3 emissions could grow over the same period due to increased procurement spend and business travel. For this reason, we are and will continue to encourage key emitters by spend in our supply chain to take steps to align with our carbon reduction aims. It is currently challenging for the Firm to reduce its business travel emissions due to significant growth in the US where options for active travel and public transport are more limited than in Europe.

Carbon reduction projects

Completed projects

The following environmental management measures and projects have been implemented since our FY 2018/19 baseline. Over this period we have reduced our total (all scopes) footprint by approximately 40 per cent, in large part through embedding the following measures in our everyday practice.

- Near-term and long-term (net zero) science-based targets on carbon reduction, validated by the SBTi.
- A target of 100 per cent renewable electricity supply to all our offices, including in our UK, by 2030, compliant with the RE100 requirements (currently we are at 99.9 per cent).
- Global environmental policy setting out, inter alia:
  - Our priorities, targets and commitments to help continually improve our environmental performance and reach net zero emissions by 2050.
  - Green building guidelines for adoption of high standards of environmental performance in our new offices, moves and refits. For example, we achieved LEED Gold in New York and San Francisco, and LEED Platinum in Raleigh in the USA.

    - Green office guidelines for all colleagues to support a consistent, high level of environmental performance across our global office network, aligned with our net zero commitments and waste reduction aims.
- An Environmental Delivery Group of regional COOs and functional leads to oversee progress with our target delivery, chaired by our Global Head of Environment, and reporting to our global leadership team.
- Global business travel policy to minimise non-essential travel and guide colleagues to low-carbon modes, carriers and routes.
- Transparent disclosure of our sustainability performance (including carbon footprint) through CDP, EcoVadis and our annual responsible business report.
- Supplier code to set out our expectations of suppliers across a range of responsible business areas including carbon reduction: transparent disclosure of footprint, science-based targets, broader disclosure through EcoVadis.
- Engagement of suppliers in carbon management and sustainability, including partnership with the UN Global Compact to deliver training to circa. 650 suppliers.
- Global mandatory environmental training for all colleagues, undertaken annually.
- ISO14,001 and ISO50,001 certification in our London office (largest by headcount and floorspace).
- Segregated waste streams in offices to promote waste recovery, with a focus on diverting waste from landfill and reduction in disposables (currently 3 per cent of our waste is sent to landfill).
- Leasing laptops and phones ('device as a service') to take a more circular, less wasteful life for IT equipment.
- Gradual adoption of secure print across the Firm programme to reduce paper consumption / waste and improved information security (currently 74.5 per cent reduction of paper since baseline).
- Salary sacrifice green commuting (cycle to work scheme in the UK) and EV leasing for colleagues in the UK.
- Continued delivery of actions under the UK's Energy Savings Opportunities Scheme (ESOS).

Future projects

In addition to the above measures:

- Review and potential update of our sustainability data platform and supplier engagement capability.
- Enhanced analytics and optimisation of global travel data for more informed decisions on mode, carrier and route.
- Global campaign to enhance waste recovery rate across the firm.
- Gradual replacement of industry average spend-based emissions factors with supplier-specific footprints and product/service footprints to improve accuracy of scope 3 emissions reporting.

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[1] and uses the appropriate Government emission conversion factors for greenhouse gas company reporting.[2]

Scope 1 and Scope 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.[3]

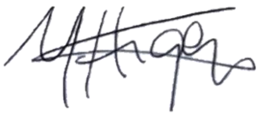
This Carbon Reduction Plan has been reviewed and signed off by the board of directors (or equivalent management body).

[1] https://ghgprotocol.org/corporate-standard

[2] https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting

[3] https://ghgprotocol.org/standards/scope-3-standard

Signed on behalf of Freshfields:



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Mark Higgs, COO, UK & Ireland

Date: 18 August 2026

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