Green Transition Plan

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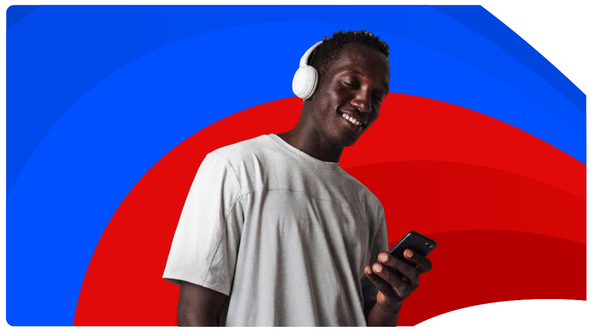

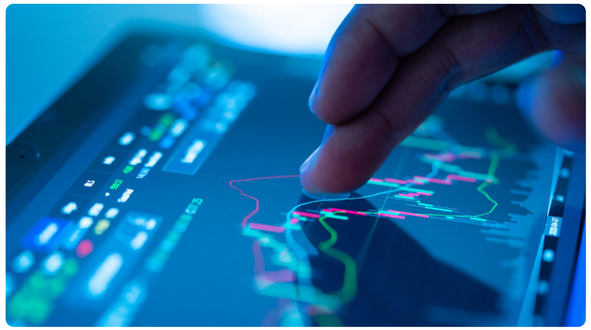

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Letter from our CEO

"Connectivity and digital solutions are central to the UK's transition to net zero and in enabling climate adaptation, but we're also aware of the environmental impacts of our business and our value chain."

Lutz Schüler, CEO of Virgin Media O2

The impacts of the global climate and nature crisis are already visible and are only set to increase.

From energy prices to extreme weather and geopolitical contexts, and the vulnerabilities of global supply chains, the challenges stemming from the changing climate are complex.

These shifts combined with rapid advances in technologies, like AI, are placing new demands on the infrastructure that is critical to our network and the UK economy. In this changing context, navigating the climate, energy and resource transitions is central to our business' resilience and future growth.

We operate critical national infrastructure and believe connectivity and digital solutions are central to the UK's transition to net zero and in enabling climate adaptation, but we're also aware of the environmental impacts of our business and our value chain. The risks that a changing climate brings require strategic thinking, investments and actions.

Planned well, our networks and services will remain reliable, affordable and sustainable, even in moments of climate-related disruptions. We are firmly committed to investing £2 billion annually in our fixed and mobile networks as part of our mobile transformation and fibre upgrade programmes and we plan to do it while reducing our carbon emissions as we grow.

To further demonstrate this, we have placed Responsible Business and a focus on Climate and Circularity at the heart of our 'Can Do' business plan which sets the direction for everyone in our company.

Our Green Transition Plan builds on the commitments we made early in the life of our merged business in 2021, including commitments to achieve Net Zero by the end of 2040 and to accelerate the move to a more circular economy. We've looked to do things the right way – having our carbon reduction targets validated by the Science-Based Target initiative, publicly supported initiatives by the We Mean Business Coalition and Race to Zero campaign, and play an active role in industry forums through the GSMA, Digital Connectivity Forum and techUK.

We have made positive progress with a 63% reduction in our direct operational emissions (Scope 1 & 2) and 35% reduction in supply chain emissions (Scope 3) on our baseline.

While we're heading in the right direction, we still have a long way to go and won't get there alone.

That's why our Green Transition Plan is so important. It sets the tone and direction for our business in the work we're doing to reduce our environmental impact, and signals where we need to work collaboratively or need support from others to remove barriers to action and create the market conditions for progress.

The plan, however, is broader than just reducing our carbon emissions – it recognises that circular business models, nature-based solutions, and resilience to climate change are all interlinked.

We look forward to sharing progress on our plan in the years ahead, and to working collaboratively with partners and stakeholders across industry and Government to make it happen.

Why a Green Transition Plan

18.8m
Homes serviecable*,**

8.7 million
premises within our full fibre footprint*

5.5m
consumers taking our services

* Including nexfibre.
** Households within reach of our active network.

The climate is changing, affecting nature, communities and businesses. Our Green Transition Plan (GTP) outlines how we're working to mitigate these impacts, reduce further risks and to enable resilience. So that in the UK we can remain connected, whatever the context.

Responding to our customers' needs

As of 31 March 2026, we reach 18.8 million homes through our coverage and serve 5.5 million fixed-line consumers, with 5.4 million consumers having a broadband internet product. Our mobile network serves 46.5 million connections, with 24.5 million contract connections. As a critical digital infrastructure provider, our operations sit at the heart of society and the economy. Digital connectivity plays a vital role in how we live, earn and socialise.

The essential services we all use every day, from calls and texts to high-speed downloads, all depend on fast, reliable, and efficient telecoms infrastructure make the importance of investing in resilient, high-capacity networks ever more critical.

By enabling smart technology, connectivity helps households cut energy use and lower their bills, from smart heating systems to flexible energy demand tools that shift electricity use to off-peak times. Expanding and upgrading our fibre network is a central part of our transition approach, enabling more energy-efficient connectivity and faster solutions.

We recognise both the opportunities and responsibilities that come with our role. Connectivity and digital solutions are central to the UK's transition to net zero, but we have our own work to do in reducing our operational impacts. Strategic planning and action are essential to keep our networks running optimally and sustainably, whatever the climate context.

Designing a deliverable plan

This GTP sets out how we intend to ensure that our business is future-fit and remains resilient to changing conditions, expectations and operating environments. It builds on the Climate Transition Plan framework, as set out by the Transition Plan Taskforce (TPT). This is used as the basis to address the challenges of the low-carbon economy and energy, and we have also considered adaptation, circularity and nature in this context. That's why we've called this our Green Transition Plan, recognising the interlinked nature of these challenges.

Our GTP covers our full value chain while acknowledging that in some important areas progress depends on action beyond our direct control. Our plan considers the dependencies that could have the greatest impact on delivery.

See the Appendix for a detailed mapping of the TPT requirements. We have also referred to the Global System for Mobile Communications Association's (GSMA) Climate Transition Planning Guidance for Telecommunications Companies[2] and other relevant frameworks including the Corporate Sustainability Reporting Directive (CSRD) transition planning requirements. Please see page 39 for more details.

Being a responsible business

We connect millions of people, homes and businesses every day. Our customers trust us to build and run the networks that modern life depends on. We have a responsibility to get it right, without limits.

Being a responsible business, for us, is about taking ownership across the full lifecycle of what we do – from how we build and run our network, to the impacts our products and services can have on people's lives.

This means reducing our environmental impact, making connectivity accessible, supporting customers to navigate the digital world safely, and keeping technology in use for longer.

Our Responsible Business Plan focuses on how we can have the greatest impact at each stage of the full lifecycle of connectivity. From reducing the footprint of our infrastructure, making connectivity more accessible, helping people feel safe and in control in the digital world, and extending the life of the technology we use.

This GTP details how we are delivering business resilience specifically by reducing the impact of our network (**Climate**) and extending the life of technology (**Circularity**).

Climate

Reducing the impact of our network

We are reducing the impact of our network by investing in more efficient, lower-carbon infrastructure and building resilience into the systems our customers rely on.

Circularity

Extending the life of technology

We are keeping technology in use for longer through repair, refurbishment and reuse, and making it easier to responsibly recycle devices and network equipment.

Connection

Making connectivity accessible to all

We are expanding access to connectivity, helping more people get online, and enabling customers to make the most of our services and participate in the digital world.

Control

Digital confidence grounded in wellbeing

We build customer confidence in our services through risk prevention, proactive and intelligent security and data protection and privacy, and we support and educate people to help them navigate the online world.

Responsible employer	Responsible supplier & partner management	Responsible business conduct
Creating an inclusive, empowering workplace, where our people grow and are supported through life	Building trusted, transparent and ethical partnerships, with a focus on fairness and equality	Acting with ethics, transparency, fairness and accountability in everything we do

Our Green Transition Plan in summary

Our GTP underpins the Climate and Circularity priorities of our Responsible Business Plan. It maps against the four parts of our value chain: Supply chain, Operations and network, Customers and The world around us.

Across our value chain, we've identified 14 transition levers – the actions that will deliver the most significant impact, fastest. Together, they address the interconnected environmental topics of carbon and energy, circularity, nature, and adaptation.

The enablers help us translate ambition into delivery – ranging from strong governance to high-quality data, with responsibility for delivering them set out clearly.

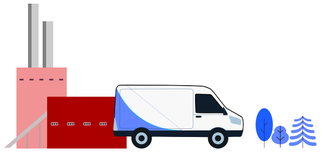
Internal objectives and key results (OKRs) for key functions and individuals are also central to our progress, helping to translate ambition into delivery.

GTP LIFECYCLE PRIORITIES

Climate
Reducing the impact of our network

Circularity
Extending the life of technology

TRANSITIONING OUR VALUE CHAIN



Our supply chain

Our operations and network

Our customers

The world around us

Delivered through our 14 transition levers, spanning...

Carbon and energy – our aims to reduce our carbon footprint and energy usage

Circularity – our work to create a more circular economy through our products, services and operations

Nature – our ambition to support thriving natural ecosystems

Adaptation – our steps to ensuring our network and operations are supported as the climate changes

ENABLERS

- Governance and policies
- Investments and financing
- Skills and training
- High-quality data
- Engagement, collaboration and advocacy

OUR ANNUAL DELIVERY PLAN

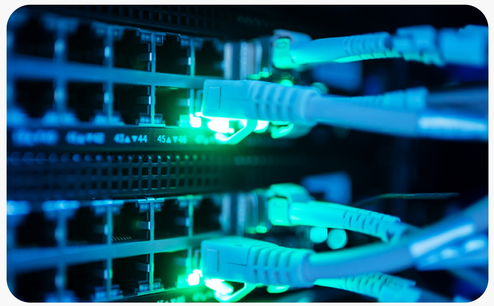
Actions, objectives and key results

The strategic ambition

Priority areas: targets and milestones

Climate: Reducing the impact of our network

Networks, data centres and devices drive 1.7% of global emissions, whilst rising climate risks threaten digital infrastructure[3].



To reduce the impact of our network, we are aiming for:

- **Near-term decarbonisation:** By 2030, to reduce operational emissions (Scopes 1 & 2) by 90% and Scope 3 emissions by 50%.
- **Long-term net zero:** By 2040, to achieve net zero emissions across our operations, products and supply chain (Scopes 1, 2 & 3).
- **Carbon-free power:** Support the UK's energy transition by working towards sourcing 100% carbon-free energy and driving energy efficiency across our operations.
- **Climate resilience:** Building and operating more climate resilient broadband and mobile networks.

Our near-term and long-term emissions reduction targets are validated by the Science Based Targets initiative (SBTi)[4], and aim to reach net zero ten years earlier than the UK Government's national target.

We plan to address our residual emissions, recognising the importance of investing in nature recovery. We expect this to deliver long-term carbon sequestration and contribute to the reversal of critical nature loss in the UK. We believe that ecosystem services and nature-based solutions can play a vital role in increasing the climate resilience of our networks.

Circularity: Extending the life of technology

Discarding devices before the end of their usable life increases electronic waste and wastes valuable, finite resources.

To help extend the life of technology, we're aiming for:

- **Refurbished devices:** Be the trusted provider for twice as many customers seeking high-quality refurbished devices by 2030.
- **Take-back:** Enable twice as many customers to easily trade in and recycle their unused devices by 2030.
- **Reuse culture:** Champion a reuse culture in 30 cities by 2030, shaping mechanisms so that tech stays in use for longer.

The way we use and manage technology is changing. We're evolving our approach as access to critical materials becomes more uncertain, costs increase and customer expectations evolve. Extending the life of hardware supports business resilience and increases consumer choice. It also reduces the impact we have on nature and biodiversity through our supply chain.

Balancing priorities

The transition to a more sustainable future involves complex decisions. There will, inevitably, be trade-offs between competing priorities.

For example, we will need to balance keeping hardware in use for longer against the potential emissions savings from upgrading to newer, more energy-efficient models. In our operations, we must balance using equipment for longer without risking outages and lower energy efficiency.

To help manage these decisions, we've developed a set of key performance indicators (KPIs). See the KPI dashboard on page 32.

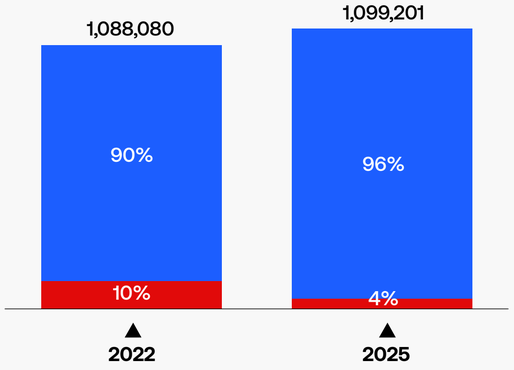
Our environmental footprint

Carbon and energy

Carbon emissions present a significant challenge for the telecoms sector. Network and mobile infrastructure are energy-intensive, needing to operate continuously to deliver a reliable service. At the same time, growing demand for faster and more dependable connectivity drives the ongoing expansion and upgrading of equipment. While these developments improve performance, they can also increase energy consumption and contribute to an increasing carbon and environmental impact.

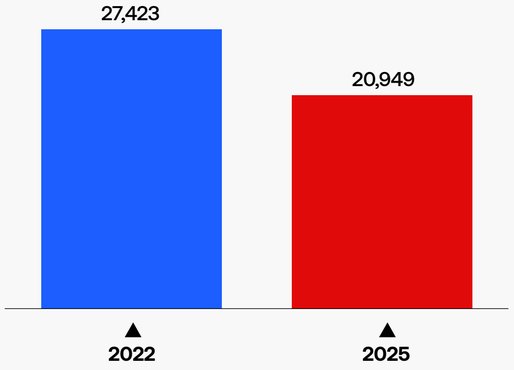
Reducing our emissions and resource use across our operations and value chain is essential. While we have reduced our carbon footprint substantially since 2020, we have lots of work still to do. Our supply chain (Scope 3) accounts for 96% of our total emissions footprint. Purchased Goods and Services (Category 1) and Use of Sold Products (Category 11) are our most material categories. Within our own operations (Scope 1 and 2), the main emissions hotspots are fleet fuel use and electricity consumption. We provide further detail on emissions calculations in the Methodology statement section on page 42.

Absolute electricity use (MWh)

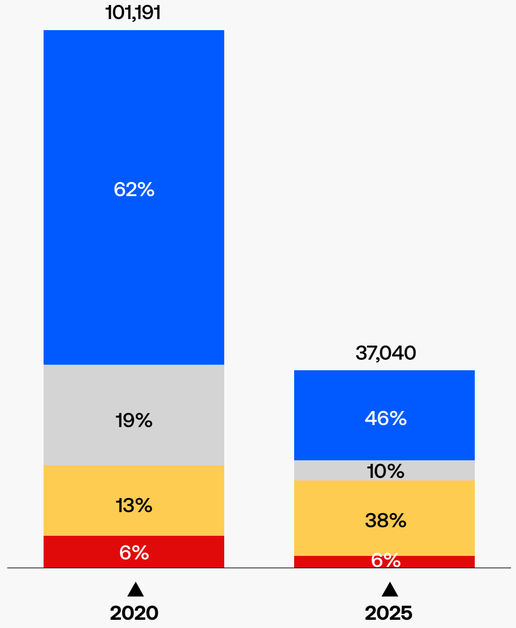


- Renewable electricity consumed
- Non-renewable electricity consumed

Electricity efficiency (kWh/pb)

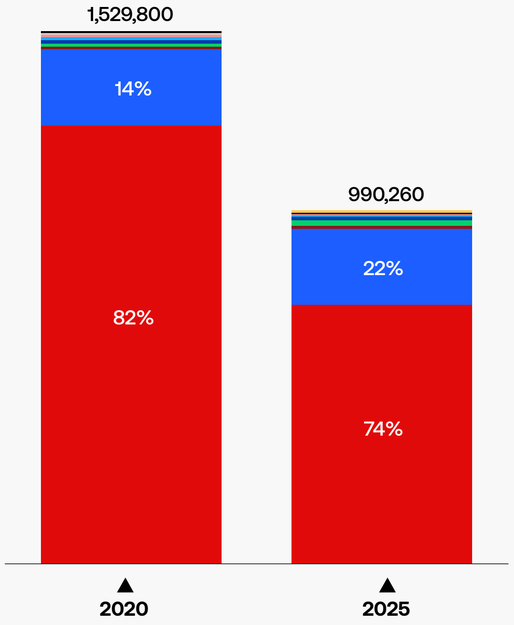


Scope 1 and 2 emissions (market-based) (tCO_2e)



- On-site fuel use
- Fuel for transportation
- Fugitive emissions
- Purchased electricity (market-based)

Scope 3 emissions (tCO_2e)



- Purchased goods and services
- Use of sold products
- Employee commuting
- Upstream transportation and distribution
- Fuel and energy-related activities
- End-of-life treatment of sold products
- Business travel
- Franchises
- Waste generated in operations
- Downstream leased assets

Percentages in charts may not equal 100% due to rounding.

Circularity

Keeping resources in use for longer is essential to our GTP. Electronic waste is the fastest-growing waste stream globally, yet only around 20% is recycled[5]. Driven by raw material extraction and processing, around 80% of a mobile phone's environmental impact occurs during manufacturing[6]. While we do not manufacture our own products, as a retailer of devices, broadband and TV equipment, we can use our influence to drive more circular outcomes. We will continue to do this by extending product lifespans, supporting reuse, repair and take-back schemes to enable our customers to more easily make circular choices. We will continue to promote opportunities for our customers to choose circular options and will embed them into our customer lifecycle approach.

Nature

Our environmental footprint extends beyond carbon emissions. As an infrastructure-intensive business, it's important that we understand and reduce our impact on nature. Our Taskforce for Nature-related Financial Disclosures (TNFD) aligned assessment, undertaken in 2025, uses the Locate, Evaluate, Assess and Prepare (LEAP) framework in line with best practice. The assessment helps us to understand our nature-related dependencies, impacts, risks and opportunities across our direct operations and Tier 1 supply chain, as well as informing our approach to investing in nature, responsible site management and supplier engagement.

At an aggregated level, the assessment found that our direct operations do not have a material impact on nature and biodiversity. However, the analysis did identify that a small number of our sites are located within or near to sensitive areas of biodiversity, which may require site-specific management.

Across our Tier 1 supply chain, the assessment did not identify any individual activity that has a materially significant impact on nature, based on what we procure. However, several of our suppliers within the electrical equipment, electronics and manufacturing sectors were identified as having material impacts associated with greenhouse gas (GHG) emissions, water and land pollution, and waste generation. These impacts reflect the broader environmental footprint of these sectors rather than impacts that are unique to the goods and services we purchase from them.

The LEAP assessment identified two potential physical nature-related risks linked to ecosystem degradation and resource availability, that could, in the future, impact our operational and supply chain resilience:

- **Supply chain disruption:** degradation of climate-regulating ecosystem services could result in production delays and increased costs as a result of disruption to our manufacturing partners.
- **Resource availability and price volatility:** growing pressure of natural resources may contribute to volatility in the prices of critical materials like rare earth elements, copper and cobalt, potentially affecting procurement costs.

We recognise the importance of continually assessing and monitoring our impact on nature, as well as exploring opportunities to reduce our footprint and support the resilience of the ecosystems on which our operations depend.

Within our GTP, we address both the localised risks and impacts in our operations alongside our supply chain risks through the integration of action on nature into our climate and circular economy workstreams.

Adaptation

Climate change is increasing the likelihood and severity of physical risks to telecoms infrastructure. Recent global assessments[7] highlight that hazards such as flooding and cyclones have the potential to cause billions of pounds of damage to network assets. According to analysis[8] of our offices and Category A technical centres, which are a critical part of the national infrastructure, 16% are at high or very high risk of surface water flooding, with 22% at high or very high risk of river flooding. These findings help inform our approach to adaptation, flood mitigation and long-term network resilience.

~80%

of a mobile phone's environmental impact occurs during manufacturing

Delivering business resilience

In a rapidly changing world, building our business resilience is essential to sustainable growth. We are mitigating physical and transition climate risks and capitalising on opportunities. The Task Force for Climate-related Financial Disclosures (TCFD) statement in our Annual Report provides a comprehensive view of how we identify, assess and manage climate risks and opportunities. This is an ongoing journey, and as our understanding deepens and new information becomes available, we'll continue to refine and evolve our approach.

Getting practical about climate adaptation

We are already feeling the impacts of climate change on our UK operations.

- **Extreme heat** during summer periods places stress on our network and can lead to increased energy consumption through additional cooling needs and lowering air-conditioning set points.
- **Storms** can temporarily disrupt parts of our network and services to customers. During Storm Eowyn in January 2025, we saw a 400% increase on the number of mobile cells out of service compared to the typical baseline. Despite this, the nature of our mobile network means we can adapt quickly and ensure customer disruption is kept to a minimum.
- **Floods** have not materially impacted our operations to date but long-term climate modelling suggests up to 22% of our 50 surveyed sites could become at high or very high risk from flooding.

While our networks have performed well in the face of more extreme weather and extended periods of heat stress, we must continue to invest to ensure resilience and reliability as the climate continues to change. This includes hosting backup generators at key sites, deploying backup cooling systems during the summer, deploying flood protection solutions and undertaking a full climate risk analysis across fixed and mobile networks. Where relevant, we are also engaging with our suppliers to build resilience throughout our supply chain.

Following the impact of Storm Arwen in 2021, we launched a multi-year, multi-million pound programme to install Lithium-ion battery backups at the sites most vulnerable to power outages. To date, we have deployed 330 Lithium-Ion battery backup units and plan to extend this to 440 of our most vulnerable cell sites. We continue to work with industry stakeholders, including Ofcom, local authorities and power companies, to develop long-term resilience strategies.

We are focusing on measuring the actual impact of climate disruption on the business through tailored, operational KPIs. This will enable us to build stronger, targeted business cases for investing in adaptation and monitoring the effectiveness of our plans. For more information on our KPIs, please see the KPI dashboard on page 32.

We view business resilience as the unifying objective for responding to the most material climate risks.

As well as identifying our climate risks and opportunities, we've mapped our priority initiatives to respond to them. This process provides a comprehensive view of how we measure, manage and strengthen our resilience to climate-related risks. We will continually assess our opportunities and initiatives into the future.

How climate risk is getting practical for us

We are increasingly focused on measuring the impact of climate disruption to the business in real time through a number of operational KPIs.

This includes financial KPIs which are useful to understand priority adaptation measures but also to monitor the effectiveness of our adaptation plans.

We are also using further KPIs that span across capital spend, supplier spend and supplier emissions. Further detail on all KPIs can be found in the KPI dashboard on page 32.

- KPI included in our external KPI dashboard
- KPI internally tracked only

	Priority climate-related risks and opportunities identified during our TCFD disclosure	We prioritise initiatives across these areas...	KPI
Physical risk	**Damage to infrastructure and disruption to operations** due to the physical impacts of climate change (Risk type: Acute and Chronic)	**Risk prevention:** Flood prevention systems	●
		Risk assessment: Ongoing analysis of climate risks and impacts, as well as corresponding adaptation measures	● ●
		Risk monitoring: Flood and temperature modelling	● ●
Transition risk	**Introduction of carbon pricing impacting operating costs** (Risk type: Policy and Legal)	**Integrate carbon into business decisions:** Embedded carbon pricing into investment plans and enterprise risk management (ERM), and linked senior leadership incentives to emissions performance	
	Shifts in consumer preferences towards greener telecoms providers (Risk type: Reputation)	**Scale circular economy offerings:** Growing our 'Like New' refurbished device programme to meet consumer demand for greener products	●
	Failure to meet emission reduction targets across Scope 1, 2 and 3 emissions (Risk type: Reputation)	**Develop decarbonisation roadmaps:** Created clear plans to reduce Scope 1, 2 and 3 emissions in line with our SBTi-validated net zero target	● ●
		Integrate carbon into business decisions: Factoring climate costs and risks, including the cost of inaction, into project and investment decisions, supported by senior accountability	
Transition opportunity	**Development of and/or expansion of low-emission products and services** (Opportunity type: Products and services)	**Scale circular economy offerings:** Expanding our 'Like New' refurbished device programme to capture demand for lower-emission products and extend device lifetimes	●
	Access to new markets via new products and services (Opportunity type: Market)	**Scale circular economy offerings:** Expanding our 'Like New' refurbished device programme and circularity services to reach new customer segments and revenue streams	●
	Green-led resource efficiency (Opportunity type: Resource efficiency)	**Reduce energy use and costs:** Optimised energy consumption across operations and infrastructure, including renewable energy procurement, to cut Scope 2 emissions and improve efficiency	●
	Become a credible, low-carbon telecom provider (Opportunity type: Resilience)	All of the above	

Key assumptions and dependencies

Despite our scale and reach, there are external factors beyond our direct control that could support or hinder how we deliver against our goals.

To make sure that we can keep progress on track, we've identified ten significant external dependencies that could fundamentally impact our approach to transitioning our value chain. These material issues are mapped to the relevant parts of our value chain – **Our supply chain, Our operations and network, Our customers,** and **The world around us**.

Our response plans take into account the materiality of these issues and our ability to influence them, and how we will continue to monitor and mitigate our exposure to them.

Our supply chain

1 Availability and affordability of EVs and supporting infrastructure

We are dependent on the sufficient availability, supporting infrastructure and appropriate costs of electric vehicles.

High Materiality | Medium Influence

2 Ability to access lower-carbon materials

Reduction of our Scope 3 emissions is reliant on the availability of alternative raw materials, as well as recycled materials that enable our suppliers to deliver lower-carbon products and services.

High Materiality | Low Influence

3 Supplier action on decarbonisation

Delivery of our GTP relies on the commitment from our suppliers to decarbonise their emissions, as well as reducing emissions further down the supply chain.

High Materiality | Medium Influence

4 Government policy and regulatory pressure on supplier action

Government policy and regulation can influence the rate at which our suppliers decarbonise and the pace at which they adopt lower-carbon technologies.

High Materiality | Low Influence

5 Accurate and complete data

We require sufficient and robust data to make well-informed, data-driven decisions and to accurately track progress against our strategic ambition.

High Materiality | Medium Influence

Our operations and network

6 Grid decarbonisation and access to renewable energy

Our decarbonisation transition relies on the availability and affordability of mechanisms to procure renewable energy and lower-carbon fuels.

High Materiality | Low Influence

Our customers

7 Customer demand for more circular, lower-carbon alternative products

We're reliant on – and have a responsibility to support – customers making more circular choices and continuing to adopt more circular practices. This includes active participation in take-back, repair and 'Like New' schemes, along with demand for products with lower carbon footprints.

High Materiality | Low Influence

8 Supplier lower-carbon and circular product innovation

We rely on our upstream suppliers to innovate, design and produce products which are more carbon-efficient and circular to manufacture. We need these solutions to be commercially viable, energy efficient during use and have a comparable performance.

Medium Materiality | Medium Influence

The world around us

9 Impact of climate change on our business and value chain

To avoid the worst effects of climate change disruption to our business and value chain and to maintain business continuity, we rely on collective global action to keep warming in line with the Paris Agreement.

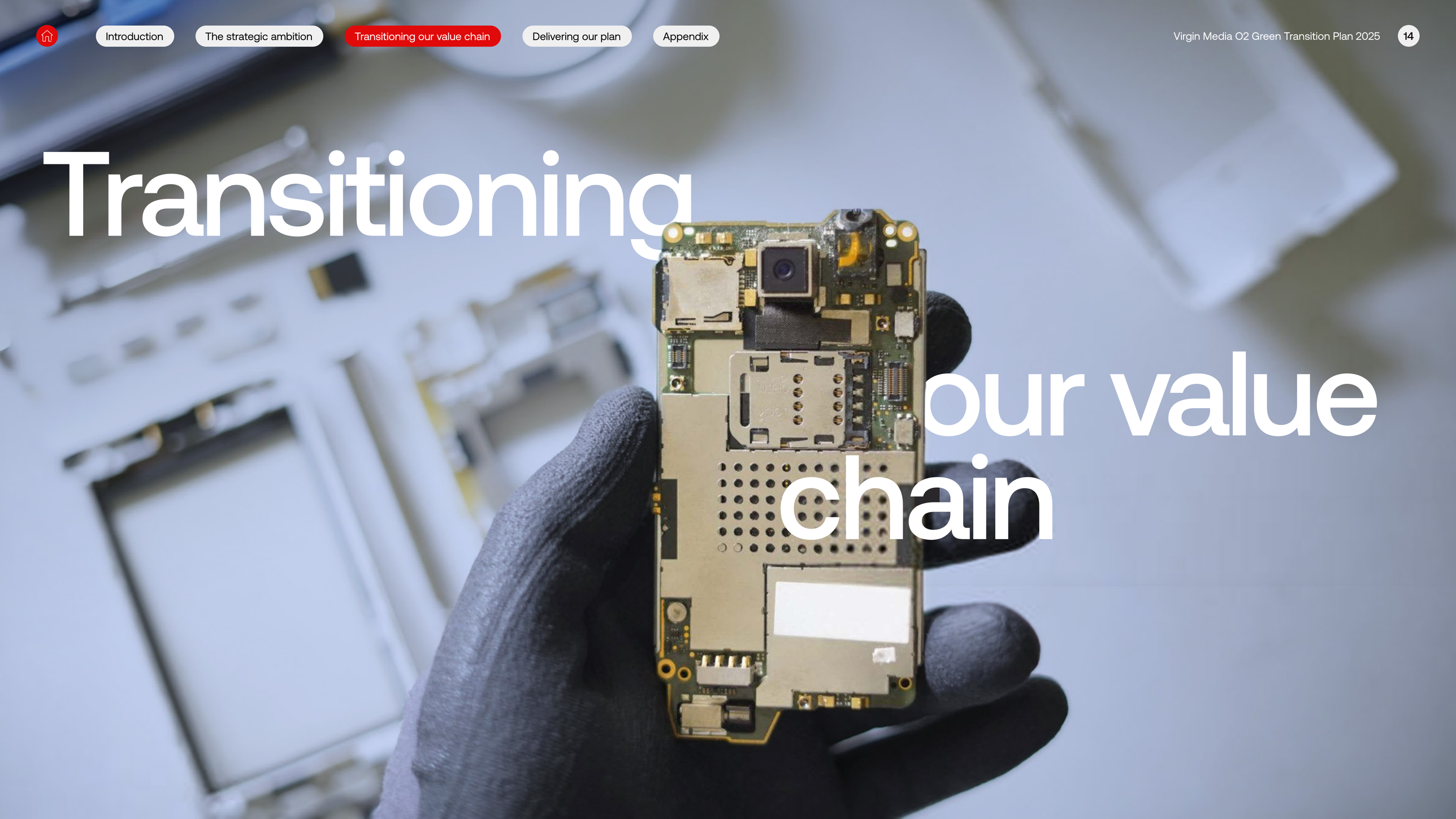
High Materiality | Medium Influence

10 Price and availability of essential raw materials

The nature of our equipment and infrastructure means we're dependent on affordable and available raw materials and components. Changes to the macroeconomic environment, including shifts in fiscal policy and evolving trade conditions, can all significantly affect the predictability of pricing.

High Materiality | Low Influence

Transitioning our value chain



Our transition levers

Our GTP focuses on 14 transition levers that represent the key actions, investments and changes we can directly control or influence to deliver against our goals. In keeping with the rest of our GTP, these transition levers are mapped to the part of our value chain they most closely affect.

They focus on our most material impact areas where we have the greatest level of influence to drive change and produce benefits for different areas of the supply chain. We aim to have initiated work on all of them by 2030. Progress will inevitably be faster in some areas than others, as we have more control and influence over certain areas.

Planning beyond 2030 is less precise. Uncertainty around market conditions, technology development and costs, as well as geopolitical factors, makes longer-term projections more challenging. To ensure our GTP remains fit for purpose and supports our ambitions, we will continue to monitor, review and refine our transition levers.

Our supply chain

1 Working with broadband, TV equipment and other device suppliers
-38%

2 Working with other suppliers
-22%

3 Working with network build suppliers
-20%

4 Working with mobile handset suppliers
-9%

Our operations and network

5 Sourcing carbon-free energy
-4%

6 Modernising the network to reduce energy use
-1%

7 Electrifying our fleet
-0.3%

8 Lowering our direct emissions through cleaner gases and fuels
-0.2%

9 Strengthening long-term resilience
N/A

Our customers

10 Improving energy efficiency of customer devices
-6%

11 Extending the lifetime of hardware devices and the resources used in them
-0.3%

The world around us

12 Investing in nature-based projects for our 'beyond-value-chain' impact
N/A

13 Establishing our carbon offsetting/ removals approach
N/A

14 Investment in our networks as an enabler for the UK's net zero transition
N/A

This graphic reflects emission reduction contributions expected from each lever against the Scope 1, 2 and 3 baseline towards our decarbonisation 2030 target. May not equal exactly 100% due to rounding.

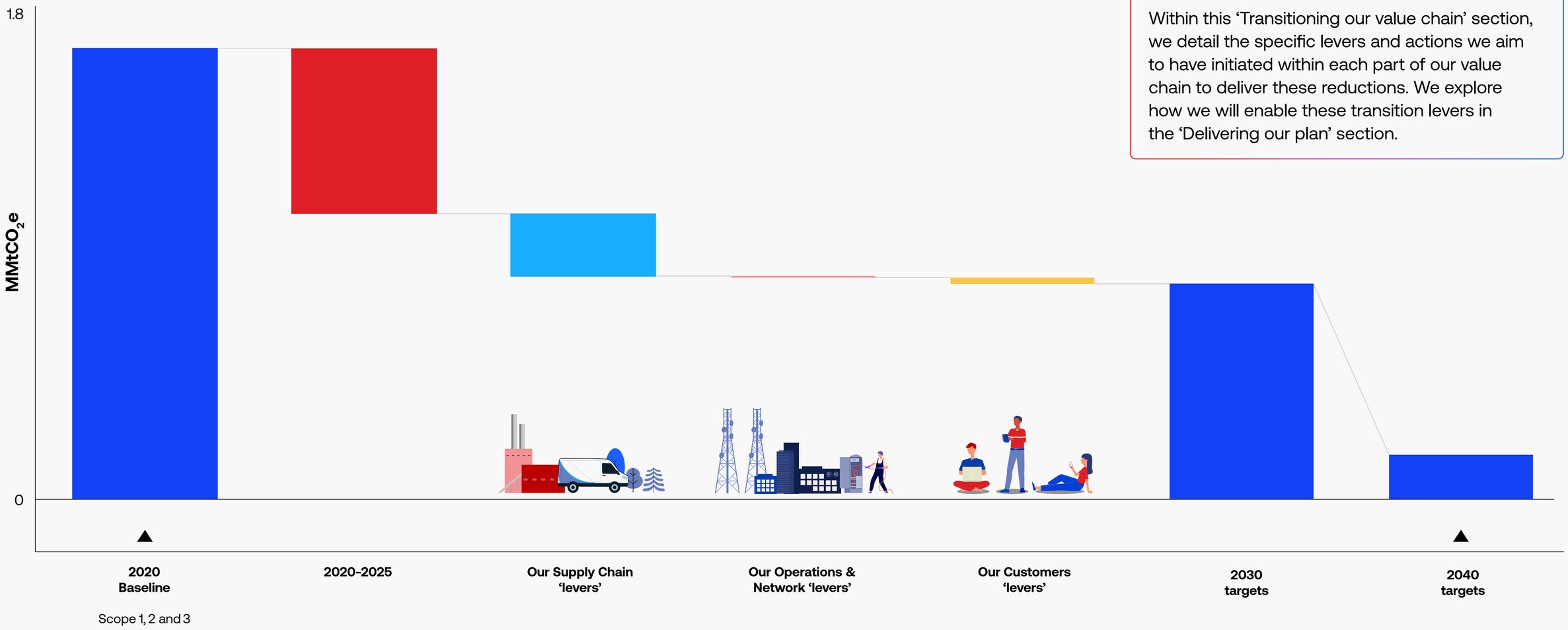
- Carbon and energy
- Circularity
- Nature
- Adaptation

Our value chain decarbonisation roadmap

Our path to 2030

We have modelled the expected contributions from initiatives within each area of our value chain out to 2030.

Within this 'Transitioning our value chain' section, we detail the specific levers and actions we aim to have initiated within each part of our value chain to deliver these reductions. We explore how we will enable these transition levers in the 'Delivering our plan' section.

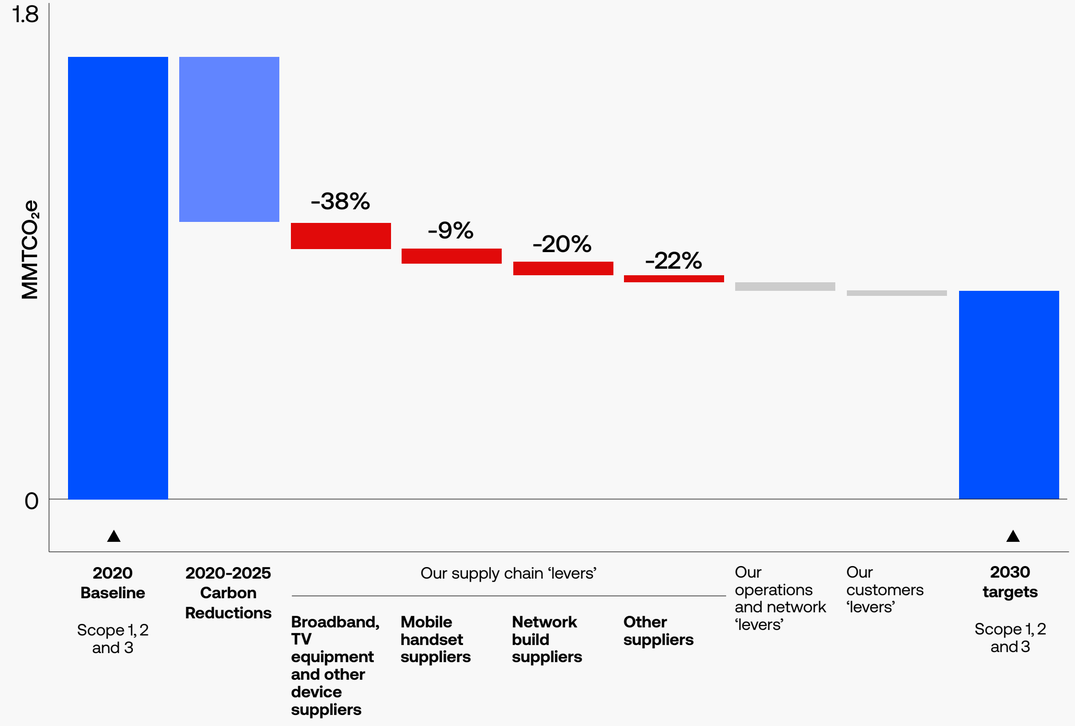


Our supply chain

In 2025, Scope 3 emissions in our supply chain accounted for over 96% of our total emissions, meaning that our supply chain represents the most material part of our environmental footprint. Its transition levers are therefore central to the success of our GTP. The purchase of network equipment, customer devices, services and logistics are the main contributors to this category.

But the impact of our supply chain goes beyond carbon. It also includes our wider environmental footprint, including resource waste, raw material use and impacts on nature. To minimise our broader environmental impact requires action beyond our own operations. How effectively we engage, influence and collaborate across our global supply chain is key to delivering our GTP.

Our transition levers across our supply chain



Supplier contributions to our environmental footprint vary, as does the level of influence we have across our supply chain. While we set baseline requirements for all our suppliers through our Supplier Code of Conduct, we prioritise further engagement with those where we can have a greater impact. This includes strategic suppliers whose products and services are particularly emissions- or resource-intensive, such as broadband, TV equipment and other device suppliers.

Our key supply chain hotspots

Our supply chain approach addresses the areas with the greatest impact, using the most significant levers:

- **Broadband, TV equipment and other devices:** These are significant contributors to our Scope 3 emissions, our wider resource consumption and nature impacts. The contributions arise from the embodied carbon associated with manufacturing, customer use and end-of-life. The footprint of each unit is relatively small, but added up across our customer base, this is one of our most material hotspots.
- **Mobile handsets, devices, accessories and SIMs:** These products contribute significantly to value chain emissions through the embodied carbon from their manufacture and use. We have limited control and influence over how the large device manufacturers create new devices. However, we recognise there are steps we can take, including working through sectoral initiatives, to reduce the associated environmental footprint and to support circular principles in product design.
- **Network build materials and activity:** The construction and upgrading of our network and mobile cell sites, including the associated logistics, generate significant carbon emissions. We continue to invest in expanding and upgrading both our fixed and mobile networks. Therefore, this remains a challenging area, particularly with mixed levels of supplier maturity. However, it remains a focus as we know there are clear opportunities to make emissions reductions.
- **Other suppliers:** We procure a wide selection of products and services – ranging from programming, packaging and stationery to services like legal and marketing. We don't anticipate that more than a small number of suppliers will ever individually represent a significant share of emissions. Therefore, real progress requires emission reductions not only from the major contributors, but also from the many suppliers that each account for smaller portions.

Key supply chain levers

Working with broadband, TV equipment and other device suppliers	Working with other suppliers	Working with network build suppliers	Working with mobile handset suppliers
What this looks like			
Partnering with our suppliers to develop products with lower embodied carbon. In part delivered through energy efficient manufacturing processes and with a focus on circularity initiatives such as through reducing the resource intensity of certain CPE (Customer Premises Equipment) products.	Directly engaging via our established carbon reduction programme. This involves identifying long-term suppliers, establishing carbon maturity levers, and delivering bespoke training on SBTi target setting and carbon emission accounting. Influencing our broader logistics suppliers to accelerate their uptake of electric vehicles. Considering the environmental impact of the adoption of AI across our business, particularly within in our supply chain. Alongside our Responsible AI Policy we are taking into consideration the environmental impact of our AI use, and this will evolve as measurement models develop. We plan to work with our suppliers through our Supplier Carbon Reduction Programme to better understand our own AI use and its impacts.	Supporting our network build suppliers with sector-specific decarbonisation support to decarbonise their operations. This includes through use of lower-carbon alternative materials where possible, such as recycled steel or lower-carbon cement. Influencing our network build suppliers to accelerate their uptake of electric vehicles, as well as investing in route planning and optimisation tools, despite the challenges posed by rural construction. See the Key assumptions and dependencies section on page 13 for more.	Encouraging our mobile handset suppliers to continue to reduce the environmental footprint associated with each new device. Ensuring we work with suppliers to maximise the potential of hardware that already exists, giving it as many 'lives' as possible. This builds on successful steps taken by some of our most significant partners in recent years, and we are committed to supporting further progress in this area.
Expected contribution to 2030 target			
38%	22%	20%	9%

Carbon and energy | Circularity | Nature | Adaptation

PROGRESS STORY

Delivering emissions reductions across our value chain

Scope 3 emissions represent 96% of our total carbon footprint. Together with our customers' use of products, our suppliers providing the products and services we purchase, account for most of these emissions. To tackle this, we launched the pioneering Supplier Carbon Reduction Programme.

The programme includes embedding carbon reduction, nature and water requirements into our Supplier Code of Conduct and Quality and Sustainability Schedule (QSS). We use supplier emissions hotspot reports to continuously assess the quantities and sources of emissions. These also help to clarify commercial decisions' impacts on emissions and environmental performance.

Through business-specific initiatives, alongside sector-wide collaboration, we're actively addressing around 50% of our addressable supply chain emissions.[9] And to help drive decarbonisation beyond our own value chain, we share our learnings with suppliers and the wider industry.

96%

Scope 3 emissions represent 96% of our total carbon footprint, which is driven primarily by our suppliers

50%

we are actively addressing around 50% of our addressable supply chain emissions

Our operations and network

As a mobile and fixed network operator, we sit at the heart of the UK's digital infrastructure. By bringing together the UK's favourite[10] mobile network operator with a fixed network that offers the nation's fastest widely available speeds, we provide seamless connectivity for customers at home, at work and on the move.

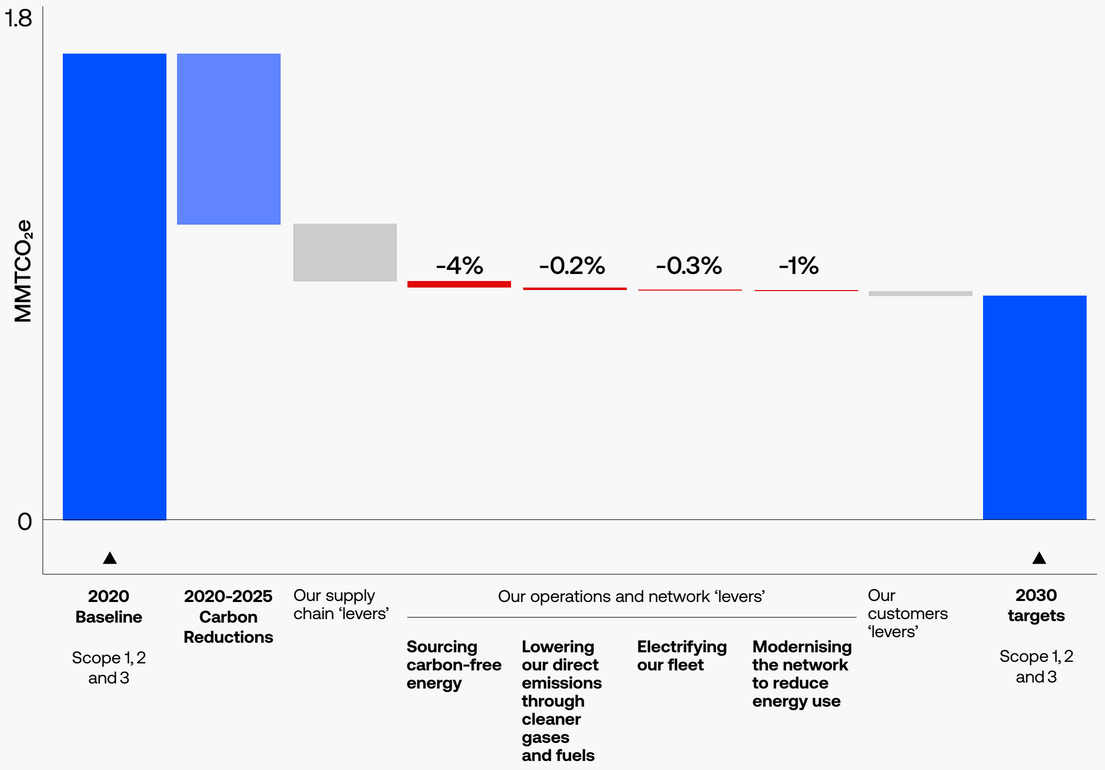
Our operations rely on a range of physical assets and processes. These include offices, a nationwide network of retail stores, 500+ technical sites that operate our fixed and mobile networks and 22,000+ cell sites that operate our mobile network. We also operate a fleet of over 4,000 cars and vans that supports sales, network build, maintenance and customer installations.

Key operations and network hotspots

→ **Fixed network**: We deliver connectivity to our customers through nexfibre[1] and our Fibre Upgrade programmes. The energy use associated with running, expanding and upgrading our network contributes to our footprint. We must keep up with demand while staying resilient, prioritising energy efficiency and managing associated environmental impacts.

→ **Mobile network:** We provide over 46 millions total connections across retail, wholesale and Internet of Things (IoT) as of Q1 2026. This includes 35 million retail and wholesale connections and 10 million wholesale connections, making us the number one provider in each segment. Our network delivers over 99% population coverage on 4G and outdoor 5G coverage to more than 87% of the UK population[10]. We also became the first operator in Europe to go live with Direct to Cell satellite mobile data connectivity through O2 Satellite.

Our transition levers across our operations and network



Key operations and network levers

Sourcing carbon-free energy	Modernising the network to reduce energy use and drive material recovery	Electrifying our fleet	Lowering our direct emissions through cleaner gases and fuels	Strengthening long-term resilience
What this looks like				
Exploring Power Purchase Agreements (PPAs), building on our first PPA announced in November 2025 (see more details in our case study on page 22) and second PPA announced in April 2026. Tiered carbon-free mains power contracts aligned with RE100, SBTi and evolving requirements. Investing in and developing onsite renewable energy where feasible. Purchasing Renewable Energy Guarantees of Origin (REGO) certificates, in line with RE100 and SBTi standards, covering mast sites where renewable energy is not available. Moving towards hourly matching for electricity consumption.	Evolving and extending our Radio Access Network (RAN) power management programme with sleep modes and enabling discontinuous transmission to cell sites. Shutting down 3G technology and migrating 3G traffic to more energy efficient 4G and 5G technologies. Modernising RAN technology to deliver energy efficiency. Investing in free air cooling to reduce energy consumption from alternative heating, ventilation and air conditioning (HVAC) systems. Upgrading and optimising remaining HVAC equipment optimisation to improve energy efficiency. Rolling out XGS-PON (passive optical network) passive optical fibres across the network, replacing less efficient alternatives. Removal of less efficient and legacy equipment from technical sites. Considering energy consumption as a key factor in business decisions. Consolidation of technical sites through our Network End State Architecture (NWESA). Deliver network hardware reuse and materials recovery at scale such as our partnership with N2S and NTT Data	Transitioning our commercial and car fleet to electric where operationally viable, as well as investing in route planning and optimisation tools. Installing charging points at strategic locations. Advocating for a long-term electric vehicle transition and national charging strategy for commercial fleets. Supporting Liberty Global's EV charging business 'Believ'[11] to roll out their charging network.	Consolidating our sites, reducing gas usage. Switching to lower-carbon back-up power solutions to replace diesel generators. Investing in free air cooling to reduce the need for mechanical cooling systems. Replacing current equipment with lower Global Warming Potential alternatives and removing banned fluorinated greenhouse gases from systems.	Rolling out XGS-PON and delivering our Mobile Transformation Plan[12] to increase network resiliency. Maintaining backup generators and cooling systems at key sites. Investing in flood protection measures at our high-risk sites. Conducting full climate risk and extreme weather analysis across fixed and mobile networks to create targeted mitigation plans. Exploring nature-based solutions to address site-level and catchment area risks; see Delivering business resilience on page 11.
Expected contribution to 2030 target				
4%	**1%**	**0.3%**	**0.2%**	**N/A**

Carbon and energy | Circularity | Nature | Adaptation

PROGRESS STORY

Securing renewable energy

We have taken further steps toward our net zero carbon emissions goal through a new long-term Power Purchase Agreement with The Renewables Infrastructure Group (TRIG).

As part of the 10-year agreement, TRIG will provide us with renewable electricity, providing around 15% of our total energy supply.

The agreement began from April 2026, where TRIG's wind farms – Earlseat in Scotland, and Garreg Lwyd in Wales – will help to power the Company's sites across the UK.

This means we have secured a long-term renewable energy supply with predictable costs, which will help us to mitigate volatility in the energy market while supporting renewable energy generation in the UK.

The agreement also underpins our commitment to only use carbon-free power at sites where we control the bill. This will support our network resilience and in turn help progress the UK's transition to a low-carbon economy.

The initiative supports our ambitious commitment to achieve net zero carbon emissions across our full value chain by the end of 2040, and is key to our sustainability strategy.

15%

TRIG will provide us with around 15% of our total energy supply

Our customers

Customers are at the heart of what we do. As a responsible business, we help them make informed choices that support their aspirations and values.

Our Responsible Business Plan responds to customers' changing behaviours and needs while also delivering on our ambitious environmental goals. As demand for faster, more reliable digital services continues to grow, providing customer choice – without compromising user experience – will only become more important. And this is vital to earning and maintaining trust.

We estimate that 6% of our planned emissions reductions by 2030 will be achieved through actions with our customers. It's a relatively small contribution to our own carbon emissions reduction plan. But we see real and lasting value in enabling the people we serve to have a more positive impact on the environment through solutions that we offer.

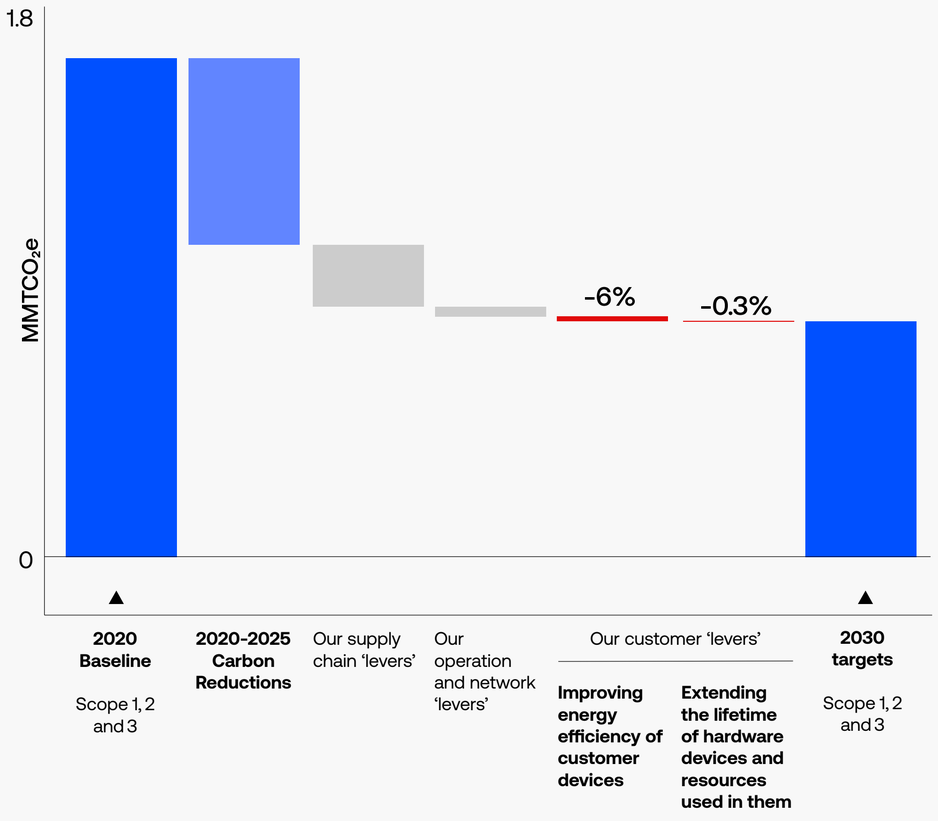
We meet this demand largely by offering products with greater energy efficiency, lifetime durability measures, along with take-back and reuse options, requiring both close collaboration with our suppliers and the support of industry groups in our sector.

We also leverage our parent companies' membership of the Joint Alliance for Corporate Social Responsibility (JAC), who engage with key suppliers on these topics – see more in the Enablers section on page 29.

Key customer hotspots

- **Energy use of products:** Customers using our products and services, e.g., broadband routers and TV equipment, account for a significant proportion of total emissions. While we have limited direct control over our customers' energy use, we can influence outcomes by working closely with our suppliers to improve device energy efficiency and extend product lifetimes.
- **Disposal of products:** Emissions associated with the disposal of our products also contribute significantly to our decarbonisation goals. To address this, we work closely with suppliers to help them embed circularity principles into product design, including using lower-carbon materials that reduce the volume of products and devices that end up discarded. Some equipment needs upgrading more frequently than others, and we operate a take-back scheme to further reduce emissions.

Our transition levers across our customers



Key customer levers

Improving energy efficiency of customer devices

What this looks like

Working with our most material product suppliers to target use-phase emissions, and collaborating (via our parent Company Liberty Global) to continue to improve the efficiency of devices.

Integrating features including high-efficiency Power Supply Units (PSUs), adaptive power scaling, deep sleep modes and load balancing features.

Informing customer choice through product-level eco-ratings information for mobile devices.[13]

Encouraging device manufacturers to continue improving energy efficiency of mobile devices. This would typically include low-power chips, efficient displays, and battery and optimising operating systems.

What this looks like

6%

Extending the lifetime of hardware devices and the resources used in them

What this looks like

Promoting our take-back schemes (including O2 Recycle) and Responsible Business Plan target to enable twice as many customers to easily trade in and recycle their devices by 2030.

Working with our fixed network product suppliers to increase recycled materials – including aluminium which avoids around 95% of the energy and emissions compared to raw material production. This builds on the success of incorporating recycled materials into our Hub 5 and Hub 5x broadband routers.

Continuing circularity principles in future designs and building on the advances of our Hub 5 and Hub 5x boxes, which are already made from recycled materials.

Leverage industry platforms to encourage mobile device manufacturers to increase recycled content and circularity of devices.

Implementing fines for customers who fail to return equipment which can be given a second life.

What this looks like

0.3%

PROGRESS STORY

Extending the life of hardware through take-back and reuse

Extending the lifespans of our products through reuse, repair and take-back schemes creates value for us and our customers. It allows them to make more circular choices, keeping products in use for longer and consuming less resources while delivering cost savings.

O2 Recycle has provided a trusted route for people to be able to trade in and recycle their mobile handsets online and in store, whether O2 customers or not. As of 1 March 2026, the scheme has recycled over 4.1m devices and paid out almost £357m to customers. It is the circular economy in action – helping and incentivising our customers to reduce e-waste by clearing out old tech, and building more sustainable habits.

Our take-back programme has also recovered over 10 million pieces of broadband and TV equipment since 2021, with over 6.8 million pieces reused.

We also provide customers with a growing choice of refurbished devices as an alternative to buying new, helping to meet growing demand for second-life products. This helps to avoid emissions from the production of new products, while delivering cost savings.

This works hand-in-hand with initiatives such as our Community Calling Device Donation programme, which delivers refurbished devices to people across the country that need them, including victims of domestic abuse, refugees and communities in need.

In January 2025, in partnership with Hubbub, we made a commitment to donate 12,000 devices from customer returns and O2 Recycle, which has continued into 2026. The programme is a live example of how we are embedding device reuse across the business to have a positive impact on our communities.

10 million

Our take-back programme has also recovered over 10 million pieces of broadband and TV equipment since 2021

The world around us

To reach net zero by 2040 and to reduce our overall environmental impact, we've prioritised absolute emission reductions and wider environmental benefits.

But we recognise that up to 10% of residual, hard-to-abate emissions may need to be neutralised. We will achieve this according to SBTi Corporate Net Zero Standard criteria, using high-quality and durable offsets and carbon removals.

Between now and our 2040 net zero target date, we have an opportunity to develop and implement a clear and credible Beyond Value Chain Mitigation (BVCM) plan. This will address our ongoing emissions, and early deployment will help reinforce the integrity of GTP and maximise its impact.

Where offsetting and removals are used, we will prioritise high-quality programmes. We will select schemes that deliver co-benefits – including biodiversity restoration, ecosystem protection and support for local communities. This approach will help us meet our net zero target while contributing to nature protection and strengthening longer-term resilience.

Beyond our own emissions footprint we're focusing on where we can support the UK's transition to net zero. Connectivity and digital solutions are fundamental for decarbonising other sectors of the economy and enabling everyday connected living, from smart meters driving household energy efficiency, to virtual working, planning more efficient journeys, and supporting online learning. By investing in our fixed and mobile networks we are helping to enable the transition and providing resilient, reliable infrastructure as a backbone to the UK's economy.

Key levers for the world around us

Investing in nature-based projects for our 'beyond-value-chain' impact

What this looks like

Exploring opportunities for co-benefits by delivery nature-based solutions for network resilience such as tree planting – providing shade to assets susceptible to overheating.

Ensuring any schemes used are high integrity, according to the Integrity Council for the Voluntary Carbon Market (ICVCM) guidance.

Support collaborative industry initiatives to support nature recovery.

What this looks like

N/A

This lever goes beyond our emission reduction requirements.

Establishing our carbon offsetting/removals approach

What this looks like

Prioritising permanence and durability for offsets that will neutralise our residual emission to reach net zero by 2040.

Using technology-based solutions, with high durability required by SBTi.

Adopting the ICVCM guidance and sourcing from Core Carbon Principles (CCP)-eligible programmes.

What this looks like

N/A

This is a lever to neutralise our residual emissions by 2040.

Investment in our networks as an enabler for the UK's net zero transition

What this looks like

Executing our Mobile Transformation Plan to deliver more reliable, resilient mobile connectivity to underpin everyday connected living.

Completing our Fibre upgrade programme, moving to a more resilient full fibre network.

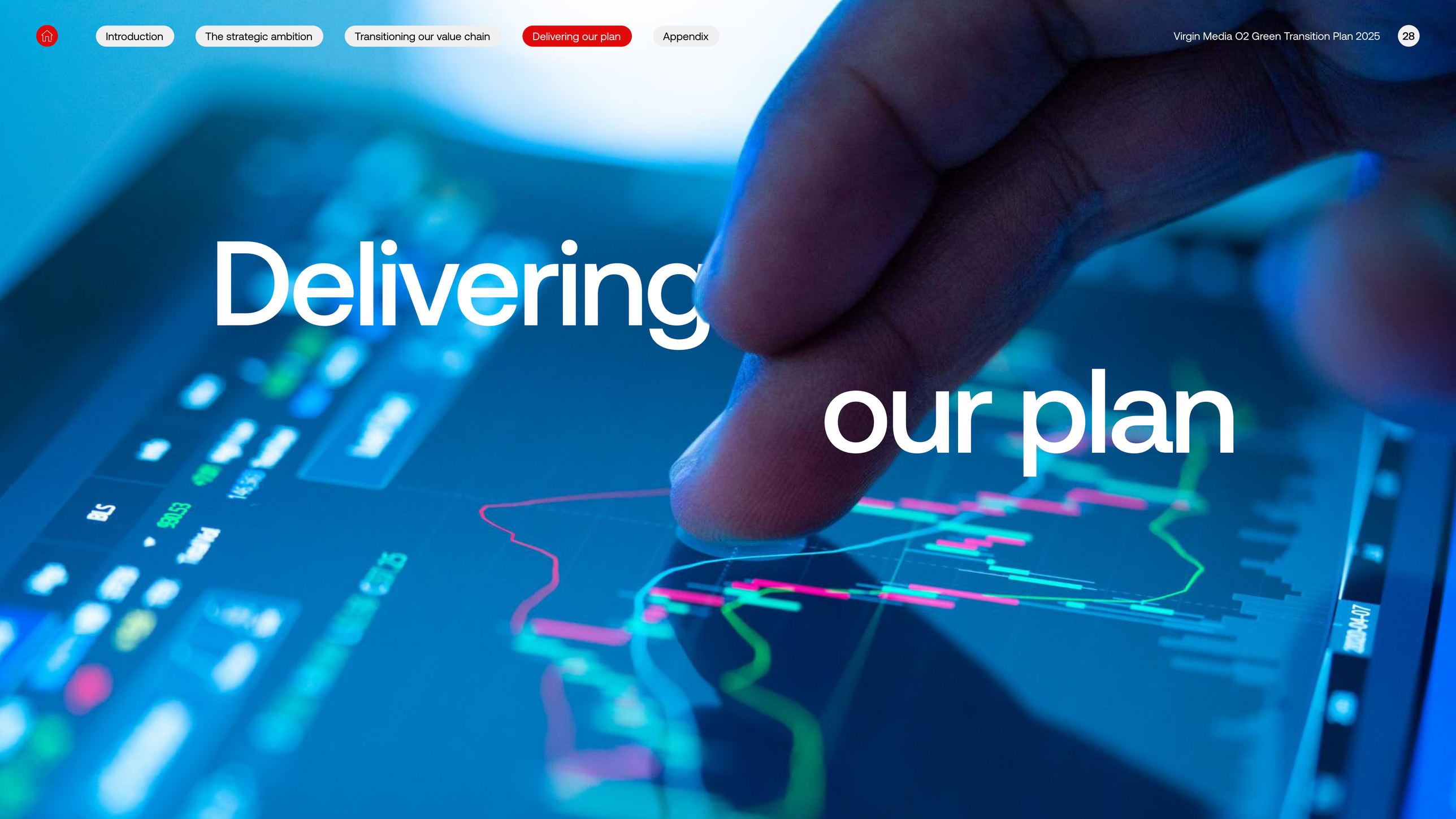
Supporting the UK's smart metering programme which enables users to manage and reduce their energy usage.

What this looks like

N/A

This is a lever underpinning the decarbonisation and resilience of other sectors.

Delivering our plan



Enablers

To translate the ambition of our GTP into delivery, we need to ensure that action is prioritised, trade-offs are managed and progress is sustained over time. Five key enablers will support this:

1. Governance and policies

Our Responsibility Committee will oversee the implementation of the GTP. Integral to the cross-business governance structure that manages our broader Responsible Business Plan, the Committee has delegated authority from our Executive Management Team. With responsibility for all decisions on sustainability matters, the Committee meets at least three times a year and includes Executive Management members and other divisional senior management team members from across the business. Our Chief Communications & Corporate Affairs Officer, chairs the Committee.

We also have mechanisms to drive and incentivise the delivery of our GTP:

- Our **Green Transition Plan Working Group** has a remit to steer the development and delivery of the plan. It meets monthly and features key individuals from across the business.
- We incorporate sustainability requirements into higher priority projects within our operations. This is called our **'Sustainability Front Door'** process, which, since launching in November 2023, has supported more than 550 projects.
- Our **Investment Committee** considers sustainability criteria for key investment decisions, with representation from the Chief Sustainability Officer. We review the sustainability impact of projects submitted to the Investment Committee.
- Our **Net Zero Steering Board** oversees how we respond to climate risks, reporting and compliance, as well as our performance against key sustainability targets and ratings. Ultimate responsibility for managing our exposure to climate risk and opportunity sits with our Audit Committee.
- Our **Circular Economy Working Group** is led by our commercial team and has representatives from our commercial, supply chain, sustainability, insight and finance teams. This working group identifies and activates commercial opportunities across our business for circularity.
- Virgin Media O2 links **management pay** with sustainability metrics, with 5% of the annual discretionary bonus linked to progress against Scope 1 and 2 emissions inline with out 2040 net zero targets.

We're in the process of creating a combined Environment and Energy Policy which will underpin the delivery of our plan. In addition, we are updating our Supplier Quality and Sustainability Schedule (QSS) to incorporate nature and water requirements.

Our Supplier Code of Conduct specifies that companies must:

- Comply with all applicable environmental legislation, regulations and directives, and have developed, reviewed and recorded processes to ensure they achieve such compliance.
- Act to minimise their use of natural resources, including water, fossil fuels and minerals.
- Act to minimise their discharges of pollutants, generation of waste and emissions.
- Act to address the climate crisis and support Virgin Media O2 in its achievement of net zero emissions by 2040.

2. Investments and finance

Our GTP requires financial and investment planning. We've carefully estimated the capital expenditure required for the GTP operational levers and factored in other significant financing decisions for the business during the coming three-year planning cycle. We track capital allocation and the financial impacts of our GTP using financial KPIs, with ultimate oversight from the Executive Management Team.

We anticipate both CapEx and OpEx demands for the delivery of the GTP, but in some cases are also expected to avoid costs associated with taking no action. Primary CapEx requirements in the short term include swapping out fire-suppression fugitive gas systems, route planning tools and site consolidation. These reflect a mix of direct investments that deliver emissions reduction, operational efficiency and resiliency as a co-benefit. The Virgin Media O2 Green Bond Framework enables us to raise funds for eligible projects.

£8.6bn

of financing which is sustainability-linked at 31 Dec 2025

3. Skills and training

Delivering business resilience will require the combined efforts of colleagues from throughout the business. We are taking actions that support cultural and behavioural shifts in line with our GTP's ambition. We share carbon and resource-use data across the business, guiding to assist individuals and functions in meeting our environmental goals. We'll continue the programme of targeted skills training, with a focus on teams prioritising the decisions most significant to the success of our plan.

4. High-quality data

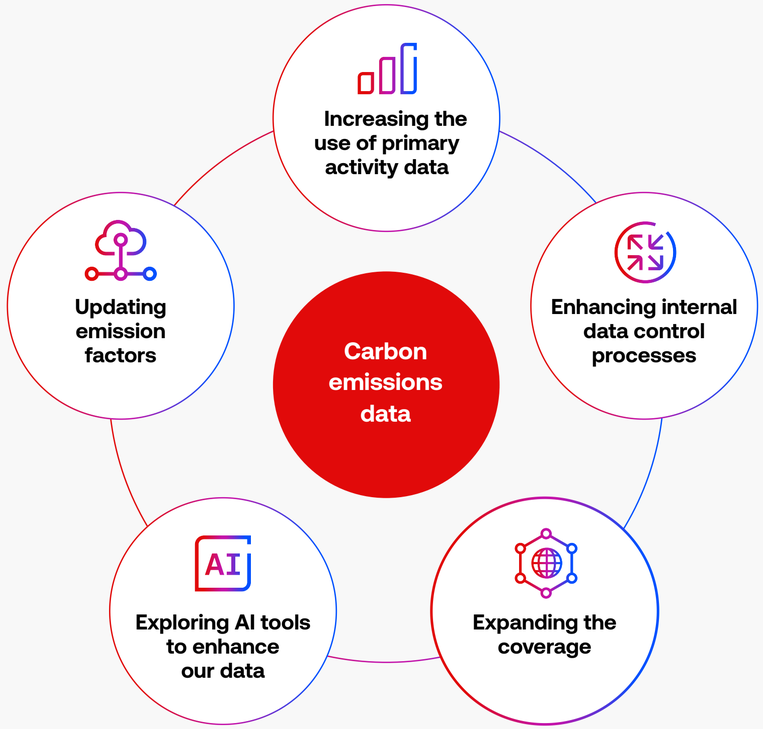
We're committed to the continuous improvement of the quality, coverage and consistency of our carbon emissions data. And we operate according to the Greenhouse Gas Protocol (GHGP).

We're planning several specific data quality improvements, including:

- Increasing the use of primary activity data.
- Updating emission factors as better data becomes available.
- Enhancing internal data control processes.
- Expanding the coverage and granularity of Scope 3 emissions.
- Exploring AI tools to enhance our data collection and subsequent reporting.
- Understanding environmental impact of AI within our supply chain and building into our long-term forecasting.

In line with standard practice, we use best estimates in some instances. Where this is the case, we apply conservative assumptions and regularly review our methodologies and data sources. We document any material methodological changes in our annual emissions reporting.

Data quality improvement plan



5. Engagement, collaboration and advocacy

As set out in this GTP, we're responsible for delivering the actions needed to meet our objectives and strengthen our resilience. However, there are areas where progress also depends on the efforts of third parties, particularly our suppliers. As outlined in Our supply chain on page 17, we prioritise engagement with strategic suppliers where we have significant influence and where their activities have a material impact on our environmental footprint.

Our supplier engagement programme is designed to reduce our Scope 3 emissions footprint. To do this, we stretch from passive requirements of all suppliers through our Code of Conduct through to targeted engagement with our top priority suppliers via our Supplier Carbon Reduction Programme.

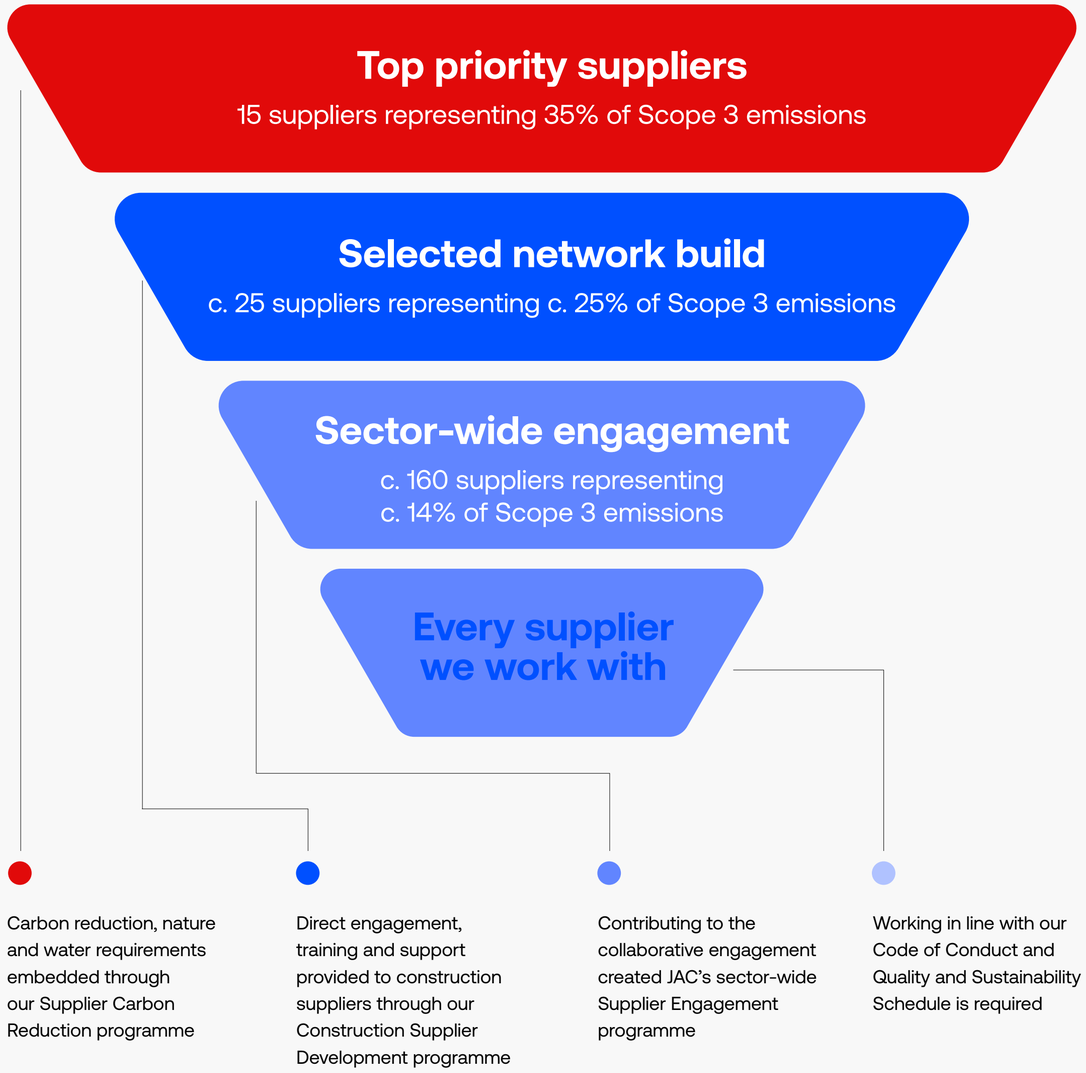
Beyond our internal teams and suppliers, we also work with a range of external stakeholders. We actively contribute to, and help shape, forums that aim to accelerate action across our sector and beyond. These include EV100, RE100, the GSMA, JAC, the GSMA Circularity Working Group, the Digital Connectivity Forum, the Climate Pledge, Race to Zero Campaign and the Circular Economy Taskforce Group for Electronics and Electricals.

How we're advocating for faster progress

Through these groups, alongside our own direct advocacy efforts, we aim to influence government policy and support faster progress in the following areas:

- **Faster grid decarbonisation:** Supporting the Clean Power 2030 Action Plan and streamlining of grid connections for mobile infrastructure.
- **Accelerate the commercial EV transition:** Including cost reductions for public charging, increasing the number of charging points and growing the number of dedicated charging bays for larger vehicles.
- **Delivery of the Government's circular economy strategy:** Promoting the adoption of second-life technology, supporting the launch of a national information campaign and seeking further Government backing for standards on refurbished equipment.
- **Supporting positive Government policy:** Support for the Department for Science, Innovation and Technology's IT Reuse for Good charter, and the Critical Minerals Strategy published by the Department for Trade. This supports both our Trade in and O2 Recycle schemes.

Our supplier engagement programme



KPI dashboard

We measure progress on our GTP implementation against KPIs. This includes financial and commercial metrics relating to our priority topics, helping us to drive progress across the business.

We recognise that our business creates both positive and negative impacts, and we measure these across our key themes: **carbon and energy, circularity, nature,** and **adaptation**.

We already assess physical and transition risks through our TCFD climate scenario analysis, helping to shape where we need to invest to adapt to a changing climate. While long-term scenario modelling remains important, we're increasing our emphasis on making climate risks simpler to track, budget for, and communicate. We do this by measuring the impact of climate disruption on our business through the year via these KPIs.

We intend to incorporate additional KPIs into future GTP updates, which will further increase the breadth and depth of our understanding.

KPI dashboard

Carbon and energy

- Absolute Scope 1 and 2 tCO_2e
- Absolute Scope 3 tCO_2e
- tCO_2e per £m revenue
- tCO_2e per PB data
- Total energy use
- Total electricity use
- Non-renewable electricity consumption
- Electricity per pb data
- % carbon-free electricity (currently defined as renewable electricity)
- % of power from PPAs
- % of fleet transitioned to EV
- % of supplier emissions engaged in our Supplier Carbon Reduction programme

Circularity

- Virgin raw material inflow per £m revenue
- Cumulative number of pre-owned devices collected for resale, reuse or recycling
- Number of pre-owned devices collected for resale, reuse or recycling
- Increase in 'Like New' devices sold

Nature

- tCO_2e sequestered annually through nature-based solutions

Adaptation

- % of sites at high or very high risk of extreme weather (e.g. flood, heat, winds)

Finance

- Financing which is sustainability linked

Our performance

Managing our environmental footprint means addressing emissions and resource use across our operations and supply chain. In 2025, our Scope 1 and 2 market-based emissions reduced by 63% and our total Scope 3 emissions reduced by 19% from our 2020 base year. The table below details emissions across all Scopes. Please see our latest Sustainability Report for more data and methodology information.

Carbon and energy

Scope	2020	2025	% change vs 2020
Scope 1	38,135	20,121	-47%
Scope 2 (location-based)	251,752	194,570	-23%
Scope 2 (market-based)	63,056	16,919	-73%
Scope 1 & 2 (market-based)	101,191	37,040	-63%
Scope 3	1,529,800	990,260	-35%
Cat 1 – Purchased goods & services	1,247,279	736,669	-41%
Cat 2 – Capital goods	0	0	n/a
Cat 3 – Fuel and energy related activities (FERA)	14,218	7,634	-46%
Cat 4 – Upstream transportation & distribution	14,738	11,442	-22%
Cat 5 – Waste generated in operations	182	43	-76%
Cat 6 – Business travel	4,281	4,727	+10%
Cat 7 – Employee commuting	22,159	8,622	-61%
Cat 8 – Upstream leased assets	n/a	n/a	n/a
Cat 9 – Downstream transportation & distribution	0	0	n/a
Cat 10 – Processing of sold products	n/a	n/a	n/a
Cat 11 – Use of sold products	216,241	216,107	0%
Cat 12 – End-of-life treatment of sold products	9,029	2,992	-67%
Cat 13 – Downstream lead assets	0	2,025	n/a
Cat 14 – Franchises	1,655	0	-100%
Cat 15 – Investments	n/a	n/a	n/a
tCO_2e per PB data (Scope 1 and 2 market-based)	Not available	0.7	n/a

Category	2022	2025
Total energy consumption (MWh)	1,171,285	1,185,178
Total electricity use (kWh)	1,088,079,611	1,099,201,281
Electricity use per petabyte data (kWh/pb)	27,423	20,949
Renewable electricity consumption (MWh)	977,697	1,058,990
Non-renewable (carbon-free) electricity consumption (MWh)	110,383	40,211
% of fleet transitioned to EV	4%	11%
% of supplier emissions committed to carbon reduction programme	Not available	45.8%

Circular economy

Category	2022 – 2025
Cumulative number of pre-owned devices collected for resell, reuse or recycling	969,618

Finance

Category	2025
Financing which is sustainability linked	£8.6bn

Putting our plan into action

Internal action plan, with objectives and key results (OKRs)

Our internal action plan underpins the details set out in this document. This is how we actually execute – with clear, prioritised and detailed actions for 2026 and beyond.

Delivering our GTP will be a cross-functional effort and will include sustainability, finance, supply chain, operations, investor relations and product teams.

Along with clearly defined accountability, ownership and timelines, our internal action plan also sets out dependencies.

Where appropriate, the dependencies are paired with specific OKRs assigned to functions across the business, responsible for the delivery of aspects of the plan.

Through the governance structures set out in our Enablers section on page 29, we'll review our internal action plan on an ongoing basis.

Looking ahead

In line with best practice, we've created our GTP according to the Transition Plan Taskforce (TPT) framework. We'll report on progress annually, with an update to our GTP every three years.

To ensure our GTP and progress updates reflect the latest requirements and guidance, we'll continue to monitor the landscape, including the ongoing revisions to several sustainability standards. Work to strengthen our GTP will include developing our nature strategy.

As well as building business resilience, our Responsible Business Plan also seeks to drive digital wellbeing. This means supporting our customers, employees and the people in our supply chain as part of the transition. Our work on digital inclusion provides a sound footing to help achieve that.

Our role in supporting a just transition will strengthen, particularly as we show how technology reuse can be a tool for social good – delivering circular economy and social inclusion outcomes.

We'll continue to refine our Scope 3 roadmap, as our suppliers, products and services, as well as budgets, adapt to meet business objectives.

Beyond 2030, we expect to be able to develop our levers with even greater precision. We anticipate our GTP benefiting from more comprehensive data, a clearer view of market conditions, better technology and a consistent policy context.

Appendix

Detailed assumptions and dependencies

Dependency	Risk to transition	Mitigating actions	Value chain relevance
1 Availability and affordability of EVs and supporting infrastructure We are dependent on the sufficient availability, supporting infrastructure and appropriate costs of electric vehicles.	High Materiality Low Influence The limited availability of operationally viable electric vehicles, their infrastructure and affordability will negatively impact our ability to reduce our Scope 1 emissions and those of our suppliers (our Scope 3).	→ Leverage our supply chain relationships to secure the best deals for vehicles and charging. → Lobby for commercial fleets to be at the heart of central and local government EV transition strategies and investment. This could help increase the availability of fleet-appropriate charging and reduce charging costs on the public charging network. → Use appropriate cross-sector forums effectively to amplify policy asks.	Supply chain: ● Operations and network: ● Customers: The world around us:
2 Ability to access lower-carbon materials Reduction of our Scope 3 emissions is reliant on the availability of alternative raw materials, as well as recycled materials that enable our suppliers to deliver lower-carbon products and services.	High Materiality Low Influence If our suppliers are unable to access lower-carbon materials, this will impact our ability to reduce our own Scope 3 emissions.	→ Engage key suppliers to ensure they're considering circularity principles in product development and service delivery. → Utilise Life Cycle Assessments (LCAs) and product carbon footprints to identify emissions hotspots related to materials and explore viability for alternatives. → Support the wider sector to drive innovation and investment in lower-carbon materials.	Supply chain: ● Operations and network: ● Customers: The world around us:
3 Supplier action on decarbonisation Delivery of our GTP relies on the commitment from our suppliers to decarbonise their emissions, as well as reducing emissions further down the supply chain.	High Materiality Medium Influence If our suppliers fail to commit and make progress in decarbonising, this will inhibit our Scope 3 emissions reductions and reduce the likelihood of meeting our strategic ambition.	→ Engage proactively and regularly with suppliers through our tiered Supplier Carbon Reduction Programme (see page 19 for case study). In 2026, we will begin to broaden out the programme to encompass engagement with key suppliers on nature and water impacts. → Operate contractual terms that drive supplier decarbonisation throughout the procurement process. → Where possible, contractually commit suppliers to decarbonisation plans and associated initiatives. → Provide targeted training and support to help suppliers build the necessary capabilities to decarbonise at pace. → Support sector-wide initiatives on supplier decarbonisation via the GSMA, Digital Connectivity Forum and Responsible Media Forum. Also, leverage our parent companies' involvement with the Joint Association for CSR (JAC).	Supply chain: ● Operations and network: Customers: The world around us:

Dependency	Risk to transition	Mitigating actions		Value chain relevance			
				Supply chain	Operations and network	Customers	The world around us
4 Government policy and regulatory pressure on supplier action Government policy and regulation can influence the rate at which our suppliers decarbonise and the pace at which they adopt lower-carbon technologies.	High Materiality Low Influence Policy and regulation influence market conditions. This, in turn, can impact the availability of lower-carbon technologies according to the relative level of incentivisation by governments.	→ Maintain horizon scanning to ensure early alignment with regulation. → Establish clear and transparent policy and lobbying positions which underpin our strategic objectives.	→ Keep an open dialogue with key suppliers through our Supplier Carbon Reduction programme. This can clarify the impact of changing policy and regulation and also create an evidence base for lobbying positions.	●			
5 Accurate and complete data We require sufficient and robust data to make well-informed, data-driven decisions and to accurately track progress against our strategic ambition.	High Materiality Medium Influence A lack of data, or poor data quality, will negatively impact our ability to accurately prioritise actions that will help us achieve effective decarbonisation.	→ Engage with our most material suppliers through our Supplier Carbon Reduction Programme, both to: – obtain accurate, primary emissions data, prioritising activity-based information or LCA measurements, that reflect the emissions generated on behalf of Virgin Media O2; and – collaborate on opportunities to decarbonise the activities that contribute most significantly to our Scope 3 footprint.	→ Collaborate with the Telecoms sector to improve carbon performance data access and accuracy for key supply chain activities. This includes increasing LCA and Product Carbon Footprint (PCF) analysis.	●			
6 Grid decarbonisation and access to renewable energy Our decarbonisation transition relies on the availability and affordability of mechanisms to procure renewable energy and lower-carbon fuels.	High Materiality Medium Influence Limited or disrupted access to renewable energy and a decarbonised grid may hinder progress to reduce our emissions in line with our strategic ambition.	→ Implement energy efficiency initiatives across our own operations, reducing energy consumption, including opportunities to leverage AI tools. → Adopt a comprehensive zero-carbon energy procurement approach, driving additional renewable energy deployments and reducing price risks.	→ Develop onsite renewables where feasible, reducing reliance on grid infrastructure. → Support sector-wide policy engagement to drive greater research and investment in alternative, lower-carbon fuels.		●		

Dependency	Risk to transition	Mitigating actions		Value chain relevance			
				Supply chain	Operations and network	Customers	The world around us
7 Customer demand for more circular, lower-carbon alternative products We're reliant on – and have a responsibility to support – customers making more circular choices and continuing to adopt more circular practices. This includes active participation in take-back, repair and 'Like New' schemes, along with demand for products with lower-carbon footprints.	High Materiality Low Influence Customer demand for reused products or products with lower emissions intensity could limit the rate at which we decarbonise our supply chain. Customers don't trust our circular options and don't use them, limiting the impact of these offerings as a business resilience lever.	→ Embed circularity into product and service design. → Make it easy for our customers to return customer equipment, mobile devices and accessories, through our returns schemes such as O2 Recycle, and ensure they are embedded in the customer journey.	→ Develop products and offers which help to extend the life of hardware and are attractive to our customers, such as our 'Like New' pre-owned device range. → Set growth targets and objectives linked to our circularity offers.			●	
8 Supplier lower-carbon and circular product innovation We rely on our upstream suppliers to innovate, design and produce products which are more carbon-efficient and circular to manufacture. We need these solutions to be commercially viable, energy efficient during use and have a comparable performance.	Medium Materiality Medium Influence The failure of key suppliers to design and deliver lower-carbon products would limit our ability to reduce our own supply chain emissions.	→ Working with our most material product suppliers, targeting use-phase emissions. This includes increasing the implementation of a 'reuse first' approach for products and network equipment, reducing carbon impacts and increasing circularity.	→ Integrating features including high-efficiency Power Supply Units (PSUs), adaptive power technology, deep sleep modes and load balancing features which avoid energy use. → Informing customer choice through Eco Rating, which provides environmental impact data for mobile handsets[15].			●	
9 Impact of climate change on our business and value chain To avoid the worst effects of climate change disruption to our business and value chain and to maintain business continuity, we rely on collective global action to keep warming in line with the Paris Agreement.	High Materiality Medium Influence Where global action to mitigate climate change is insufficient, the increasing frequency and severity of extreme weather, competition for resources and geopolitical events will heighten business disruption risks. This will also hinder our ability to meet our strategic ambition for resilience.	→ Integrate up-to-date climate modelling of the impacts of extreme weather events into our network strategy and investment planning. → Explore nature-based solutions that can increase the resilience of our assets.	→ Reduce all operational emissions where we have direct control. → Work with suppliers to assess the impact of climate change on our value chain.				●
10 Price and availability of essential raw materials The nature of our equipment and infrastructure means we're dependent on affordable and available raw materials and components. Changes to the macroeconomic environment, including shifts in fiscal policy and evolving trade conditions, can all significantly affect the predictability of pricing.	High Materiality Low Influence If the availability of raw materials reduces or the price of materials increases, this may result in supply chain disruption – making it harder to plan and meet our strategic ambition.	→ Work closely with suppliers to agree on long-term contracts that limit the impact of short-term price fluctuations. → Work with suppliers to introduce circularity design principles into products that will reduce demand for raw materials.	→ Support government circularity and critical material strategies. → Leverage product take-back schemes such as O2 Recycle to reduce reliance on new stock.				●

TPT mapping

We have mapped the alignment of the GTP with the TPT framework. This was used as a guide for the creation of our plan, along with other best practices, such as CSRD transition planning requirements.

TPT Pillar	TPT Sub-section	Relevant section	Alignment (RAG)	Areas for future improvement
1. Foundations	1.1 Strategic ambition	The strategic ambition, pages 7-13		
	1.2 Business model and value chain	Our Green Transition Plan in summary, page 6; Transitioning our value chain, pages 14-26		
	1.3 Key assumptions and external factors	Key assumptions and dependencies, page 13; Detailed key assumptions and dependencies, pages 36-38		
2. Implementation strategy	2.1 Business operations	Our operations and network, pages 20-23; Delivering business resilience, pages 11-12		
	2.2 Products and services	Our supply chain, pages 17-19; Our customers, pages 23-26		
	2.3 Policies and conditions	Enablers, page 29		We continue to work on refreshing our policy suite including updates to our Supplier Code of Conduct, Environmental Policy and introduction of an Energy Policy to support the objectives of our GTP more directly.
	2.4 Financial planning	Enablers, page 30		We continue to work with our Finance team to ensure the CapEx and OpEx requirements for our transition levers are fully embedded and our transition plan KPIs are informing long-term financial planning and decision making.
3. Engagement strategy	3.1 Engagement with value chain	Transitioning our value chain, pages 14-16; Enablers, page 31; Detailed assumptions and dependencies, pages 36-38		

TPT Pillar	TPT Sub-section	Relevant section	Alignment (RAG)	Areas for future improvement
3. Engagement strategy (continued)	3.2 Engagement with industry	Enablers, page 31; Detailed assumptions and dependencies, pages 36-38		
	3.3 Engagement with government, public sector, communities and civil society	Enablers, page 31; Detailed assumptions and dependencies, pages 36-38		With our Public Affairs team, we'll continue to identify opportunities to engage with the Government on our key advocacy areas in line with our GTP.
4. Metrics & targets	4.1 Governance, engagement, business and operational metrics and targets	Priority areas: targets and milestones, page 8; Our environmental footprint, page 9; Our performance, page 33		
	4.2 Financial metrics and targets	KPI dashboard, page 32; Our performance, page 33		We continue to assess our KPI dashboard including financial metrics and targets to evolve our GTP monitoring and tracking.
	4.3 GHG metrics and targets	Priority areas: targets and milestones, page 8; Our environmental footprint, page 9; Our performance, page 33		
	4.4 Carbon credits	The world around us, pages 26-27		
5. Governance	5.1 Board oversight and reporting	Enablers, page 29		
	5.2 Management roles, responsibility and accountability	Enablers, page 29		
	5.3 Culture	Enablers, pages 29-31		
	5.4 Incentives and remuneration	Enablers, page 29		
	5.5 Skills, competencies and training	Enablers, page 30		As outlined in the Enablers section, we plan to roll out specific training to the most material teams in the business for the implementation of our GTP.

Glossary of key terms and acronyms

Adaptation: The process of adjustment to actual or expected climate and its effects, in order to moderate harm or capitalise on beneficial opportunities.

Beyond Value Chain Mitigation: BVCM describes the practice of purchasing voluntary carbon credits as an additional action, above and beyond what a company does to reduce emissions within its value chain.

Carbon-free energy: Energy produced by a resource that generates no carbon emissions.

Co-benefits: A positive effect that a policy or measure aimed at one objective has on another objective, thereby increasing the total benefit to society or the environment. Co-benefits are also referred to as ancillary benefits.

CSRD: The Corporate Sustainability Reporting Directive establishes requirements for companies to disclose sustainability information as part of their corporate reporting.

Customer premises equipment: CPE refers to in-home routers, smart home gadgets such as video doorbells and TV set-top boxes which Virgin Media O2 secures, configures and manages.

Embodied carbon: The emissions generated from the supply and manufacturing of a product and excluding the emissions from its use.

Hardware: Devices, wiring and other physical components that support a computer or other electronic system or device.

Impact driver: The activities, operations and processes that lead to environmental or social impacts.

Internet of Things: The growing network of web-enabled physical objects which can relay data to other devices and systems for automating, monitoring and optimising tasks. Can include a wide variety of devices, from washing machines to cars.

LEAP Assessment: Standing for, Locate, Evaluate, Assess, Prepare, a four step assessment process developed by the Taskforce on Nature-related Financial Disclosures.

Lifecycle assessments (LCAs): Compilation and evaluation of the inputs, outputs and the potential environmental impacts of a product or service throughout its lifecycle.

'Like New' products: Used or purchased devices that have been refurbished to a high standard, with no visible wear, and will operate at or close to the performance of the original item when new. We check every screen, camera, battery and button to ensure it's in good shape.

Materiality: The principle of defining the sustainability topics which matter most to the business and its stakeholders, and therefore the threshold for determining which information is significant enough to be disclosed.

Mitigation: Action(s) taken to reduce the extent of a negative impact.

Network equipment: The physical hardware and integrated software components used primarily for telecommunications. This includes all the apparatus required for the routing, switching, or transmission of data and voice services across a network.

Network infrastructure: The comprehensive ensemble of hardware (cabling, antennas, routers), software applications, and supporting services that enable devices and users to exchange information.

Objectives and Key Results (OKRs): OKRs represent a strategic goal-setting framework to align teams around ambitious, measurable growth and operational targets. Objectives define high-level qualitative goals while Key Results are quantifiable milestones.

Power Purchase Agreements (PPAs): Long-term agreements to purchase renewable electricity from generators, providing certainty over supply, pricing and emissions reduction.

Power-supply units (PSUs): Internal hardware components that convert external electrical power (AC) into stable, regulated direct current (DC).

Renewable Energy Guarantees of Origin (REGOs): A certificate which verifies that electricity has been generated from renewable sources.

Resilience: The capacity of interconnected social, economic and ecological systems to cope with a hazardous event, trend or disturbance, responding or reorganising in ways that maintain their essential function, identity and structure.

Second life devices: The systematic reuse of products or components, such as retired network hardware or batteries, for new applications after their original use phase has ended.

Take-back schemes: A circular economy initiative where telecommunications producers or retailers collect end-of-first life products – such as mobile devices or decommissioned hardware – from customers for professional refurbishment, reuse or responsible recycling.

TCFD: Task Force on Climate-related Financial Disclosures. A global framework against which organisations, including large telecoms, disclose climate-related financial risks and opportunities across four pillars: governance, strategy, risk management, and metrics and targets.

TNFD: The Taskforce on Nature-related Financial Disclosures is a global initiative providing organisations with a risk management and disclosure framework to act on evolving nature-related dependencies, impacts, risks and opportunities.

Telecoms (Telecommunications): The electronic transmission of information (voice, data, video) over significant distances via systems such as phone lines, fibre optics, satellites and mobile networks.

Use-phase emissions: The greenhouse gas (can be referred to as 'carbon') emissions generated during the operational lifetime of sold products. These are classified as Scope 3 Category 11 emissions.

Wholesale connections: The provision of network capacity or infrastructure by a Tier 1 carrier or wholesaler to other businesses such as internet service providers for resale to end-users.

Footnotes and references

1 nexfibre is a joint venture between InfraVia Capital Partners, Liberty Global, and Telefónica that is building a full-fibre-to-the-home (FTTH) network in the UK.

2 GSMA. (2023). Climate Transition Planning Guidance for Telecommunication Companies. GSMA Solutions and Impact. https://www.gsma.com/solutions-and-impact/connectivity-for-good/external-affairs/gsma_resources/climate-transition-planning-guidance-for-telecommunication-companies/

3 World Bank; ITU. (2024). Measuring the Emissions and Energy Footprint of the ICT Sector: Implications for Climate Action. © World Bank and International Telecommunication Union. http://hdl.handle.net/10986/41238 License: CC BY-NC-SA 3.0 IGO.

4 Per the SBTi Corporate Net Zero Standard, our net zero targets represent an emissions reduction of 90% across our Scopes 1, 2 and 3 by 2040 compared to our baseline.

5 Virgin Media O2. (2026). Creating a circular economy. https://news.virginmediao2.co.uk/responsible-business/creating-a-circular-economy/

6 GSMA. (2022). GSMA publishes vision for a 'circular economy' of mobile devices. https://www.gsma.com/newsroom/press-release/gsma-publishes-vision-for-a-circular-economy-of-mobile-devices/

7 Oughton, E. J., Russell, T., Oh, J., Ballan, S., & Hall, J. W. (2023). Global vulnerability assessment of mobile telecommunications infrastructure to climate hazards using crowdsourced open data. https://doi.org/10.48550/arXiv.2311.04392

8 We provide further detail on our climate resilience on page 63 of our Annual Report and Consolidated Financial Statements. https://news.virginmediao2.co.uk/wp-content/uploads/2025/04/VMED-O2-UK-Limited-2024-Annual-Report-and-Consolidated-Financial-Statements.pdf

9 Based on annual supplier hotspot reporting.

10 https://www.virginmediao2.co.uk/about-us

11 https://www.believ.com/drivers/pricing/

12 https://news.virginmediao2.co.uk/o2-doubles-down-on-mobile-network-improvements-in-2026-with-700m-investment/

13 https://www.ecoratingdevices.com/

Methodology statements

Please refer to our reporting criteria document for more information on our calculation methodology.

Legal disclaimer

This Green Transition Plan includes forward-looking statements that involve uncertainties, assumptions and dependencies. Forward-looking statements encompass all non-historical information, including plans, climate-related targets and objectives. Actual outcomes may differ from those suggested by these statements. Although this report was produced with appropriate information at the time, Virgin Media O2 cannot guarantee any outcomes and users are advised to not rely excessively on these statements.

About our Plan

This plan was developed in partnership with our external sustainability advisory partner SB+CO, part of SLR Consulting.

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