

ZPG Limited (Group) Transition Plan

Last update: May 2026

Introduction

This document outlines the transition plan for ZPG Limited and its subsidiaries.

In 2025, ZPG Limited set interim and Net-Zero targets which were validated by the Science Based Targets initiative (SBTi) in 2025.

This transition plan has been developed in alignment with the Transition Plan Taskforce (TPT) framework.

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Foundations

Our Strategic Ambition

Following global agreements such as the Paris Agreement in 2015 and the Glasgow Climate Pact in 2021, countries including the UK have introduced legislation to limit global temperature increases to well below 2°C above pre-industrial levels, with a preferred limit of 1.5°C.

ZPG Limited (ZPG) is committed to a net-zero future and has pledged to achieve net-zero greenhouse gas emissions across its entire value chain by 2040. To support this, we have set targets to reduce scope 1 and 2 emissions by 47.2 percent and scope 3 emissions by 42 percent by 2030, compared with 2022 levels.

As a service-based business with a small operational footprint, we acknowledge that achieving our scope 3 net-zero goals depends on working closely with partners and stakeholders across our value chain. Our goal is to identify opportunities to reduce emissions and take meaningful action together.

Our transition plan aims to demonstrate our net-zero ambition by including the actions both within and outside of our control which could help us progress towards our scope 1, 2, and 3 intermediate (by 2030) science-based targets, and ultimately, our net-zero targets.

Methodology

We have used the methodologies of the SBTi, in line with the GHG Protocol, to calculate our near-term and net-zero targets for its scope 1, 2, and 3 carbon emissions. We have used a baseline year of 2022 to set our targets. A summary of our baseline year emissions can be found in Appendix A.

The proposed targets have been developed in alignment with a rate of decarbonisation consistent to keep global temperature increase to 1.5°C compared to pre-industrial temperatures.

Near-Term Targets:

- **Scope 1 & 2:** Reduce absolute GHG emissions by **47.2% by 2030** from a 2022 baseline.
- **Scope 3:** Reduce absolute GHG emissions by **42% by 2030** from a 2022 baseline.

Net-Zero Targets:

- Achieve **Net Zero GHG emissions across our value chain by 2040**.
- Reduce absolute Scope 1 and 2 emissions by **90% by 2040** from a 2022 baseline.

Business and Value Chain

ZPG owns and operates some of the UK's most trusted digital brands that help empower smarter property and household decisions. It is also one of the leading residential property data and software providers in the UK and the Netherlands. A list of the group companies included within the group net-zero and transition plan can be found in Appendix B.

Our key value drivers

- User growth and engagement metrics
- Platform uptime, performance, and security
- Service quality
- Efficiency of cloud infrastructure and data centre operations

Our operations and value chain

ZPG's businesses are all service-based and provide consumers with information and data to support their decision making.

Our primary resource is our people who drive the delivery of our services. As a technology-based group, we have limited emissions from operations, with our value chain emissions being our largest contributor of total emissions. We therefore have developed our transition plan taking into consideration our ability to control emissions reduction goals.

Our value chain comprises the majority of our emissions, particularly in relation to our use of data centres and marketing activity.

We do not anticipate significant changes in our business model or value chain as a result of our transition plan.

Instead, we expect to achieve our targets through behavioural shifts and engagement with value chain stakeholders.

Parts of Business and Value Chain Covered by the Transition Plan:

The transition plan covers all operations and activities that contribute to Scope 1, 2, and relevant Scope 3 emissions across the group, including:

- Direct emissions from owned assets (Scope 1)
- Indirect emissions from electricity purchased for operations (Scope 2)
- Relevant Scope 3 emissions such as purchased goods and services, capital goods, business travel and employee commuting.

Expected Evolution of the Business Model During Transition:

- Migration to 100% renewable-powered cloud infrastructure and hosting services where feasible.
- Optimisation of software and digital architecture to reduce energy intensity.
- Optimisation of office space to reduce building energy use.
- Engagement with suppliers and cloud partners to accelerate decarbonisation in upstream Scope 3 emissions.

Assumptions and Dependencies

Key Assumptions Underpinning the Transition Plan:

- Electricity grids in the group's core operating markets will continue to decarbonise in line with national and regional net-zero pathways, reducing the emissions intensity of purchased electricity over time.
- Cloud service providers and third-party data centre operators will continue to make progress against their publicly stated renewable energy and net-zero commitments.
- Energy efficiency improvements in software architecture, data storage, and web traffic management will deliver incremental reductions in energy consumption per user.
- Supplier data availability and quality for Scope 3 emissions will improve over time, enabling broader and more accurate coverage of value chain emissions.

Critical External Dependencies:

- **Technology and Infrastructure:** Availability of low-carbon cloud computing services, renewable-powered data centres, and energy-efficient networking infrastructure.
- **Supplier Action:** Decarbonisation strategies and transparency from cloud providers, hosting services, and key digital infrastructure suppliers.

- **Policy and Regulation:** Continued policy support for renewable electricity deployment, data centre efficiency standards, and carbon disclosure requirements.
- **Market Conditions:** Sustained demand for digital services without disproportionate increases in data intensity or energy consumption per user.

Uncertainty and Sensitivity Considerations:

- Slower-than-expected grid decarbonisation would materially affect Scope 2 emissions trajectories.
- Scope 3 emissions outcomes are highly dependent on supplier performance, particularly cloud and data centre providers.

Approach to Managing Uncertainty:

- Regular review of assumptions relating to grid emissions factors, supplier targets, and technology performance.
- Use of multiple scenarios to test resilience of the transition plan against variations in digital demand growth, energy efficiency improvements, and supplier decarbonisation rates.
- Commitment to progressively refine assumptions and disclosures as data quality and external guidance evolve.

Implementation Strategy

Our decarbonisation strategy focuses on removing carbon-intensive activities and assets, and the transition to renewable energy across our operations. Further, given the comparative scale of our value chain emissions, we are focused on engaging with our supply chain to encourage alignment with our decarbonisation goals.

We have outlined our current and planned actions in order to achieve our emissions reduction and net-zero goals.

Action	Scope	Progress	Control	Implementation Strategy
Removal of gas from office environments	Scope 1	On track	Partial control	The Group operates four office locations. All UK offices under full operational control no longer use gas. One UK office operates under a service lease and is therefore outside full control, however, is also no longer using gas. The Netherlands office continues to use gas for central heating; due to lease constraints, the Group is currently unable to transition this location away from gas use.
Removal of company-owned vehicle fleet	Scope 1	Complete	Full control	Between 2023 and 2025, the Group systematically reduced its company-owned vehicle fleet from 12 vehicles to zero. As of the end of 2025, the Group no longer owns any vehicles and does not anticipate reintroducing a company-owned fleet.
Sourcing 100% renewable electricity	Scope 2	On track	Partial control	The Group is transitioning all offices under operational control to 100% renewable electricity. The London headquarters is now fully supplied by renewable energy. The Cardiff office is expected to complete its transition in 2026. Offices under service leases remain outside the Group's direct control for electricity procurement.

Implementation Strategy

Action	Scope	Progress	Control	Implementation Strategy
Energy efficiency measures in office environments	Scope 2	On track	Full control	The Group is subject to the UK Energy Savings Opportunity Scheme (ESOS) and has implemented an energy action plan across its UK operations. This plan includes targeted measures to improve energy efficiency and reduce overall electricity consumption in office environments.
Supplier engagement on emissions data	Scope 3	On track	Partial control	In 2025, the Group launched a programme to improve the accuracy of Scope 3 emissions reporting by collecting supplier-specific emissions data from its most significant suppliers. This has enabled a more granular understanding of the Group's value chain emissions profile and helped identify priority suppliers for deeper engagement and future emissions reduction initiatives.
Sustainable procurement considerations	Scope 3	On track	Full control	In 2025, the Group embedded a sustainable procurement module into its supplier onboarding process. All new suppliers are assessed against defined climate criteria, including the existence of SBTi-aligned targets and the identification of climate-related risks. These assessments inform supplier selection decisions and support alignment between procurement practices and the Group's own SBTi targets.

Engagement Strategy

Value Chain Engagement

The Group recognises that a significant proportion of its greenhouse gas emissions arise within its value chain, particularly from cloud service providers, digital infrastructure suppliers, and other third-party service providers. Engagement with these suppliers is therefore a key component of the Group's transition plan.

The Group's approach to engagement is risk- and materiality-based, prioritising suppliers that contribute most significantly to Scope 3 emissions or are critical to the delivery of the Group's services. Engagement activities are currently focused on improving the quality of emissions data, understanding supplier decarbonisation strategies, and identifying opportunities for alignment with the Group's climate ambition.

Where the Group has appropriate commercial influence, it seeks to encourage suppliers to measure and disclose greenhouse gas emissions using recognised methodologies and to demonstrate progress towards emissions reduction, including through the use of renewable electricity and energy-efficient digital infrastructure. The Group recognises that its ability to influence outcomes varies by supplier and market.

Customers and Platform Users

The Group's products and platforms are designed to deliver digital services efficiently while maintaining performance, reliability, and security. The Group seeks to limit the growth of emissions associated with user activity primarily through platform optimisation, software efficiency improvements, and infrastructure choices, rather than by placing direct requirements on users.

The Group monitors the emissions implications of growth in user activity and data usage and considers these factors as part of its product development and infrastructure planning processes.

Policy and Industry Engagement

The Group monitors policy and regulatory developments related to climate transition, digital infrastructure, and energy efficiency in the markets in which it operates.

Ongoing Review

The Group's engagement approach will evolve over time as data quality improves, supplier practices develop, and regulatory and market expectations continue to mature. Progress and limitations related to engagement activities will be reviewed regularly and reflected in future updates to the transition plan where relevant.

Metrics and Targets

Our progress towards our scope 1, 2 and 3 targets (near-term and net-zero), are monitored on an annual basis in line with our annual emissions reporting process. Operational energy consumption is monitored on a monthly basis in accordance with our internal environmental policy. A detailed breakdown of the group's baseline year emissions can be found at Appendix A.

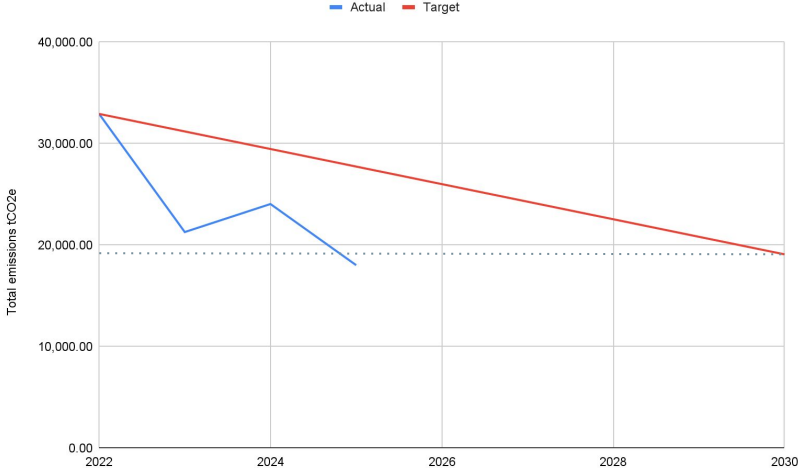
	Baseline Year (2022) tCO2e	2030 Target tCO2e	2025 Year tCO2e	Progress
Scope 1	116.12	61.31	19.6	The significant reduction in scope 1 emissions results from efforts to wind down the company-owned vehicle fleet, this project was completed in 2025. Further, fugitive emissions from refrigerants have reduced from 2022 to 2025, a result of efforts to improve HVAC controls and energy use monitoring in office environments. Residual scope 1 emissions relate to refrigerants and a small amount of gas use in the Delft office.
Scope 2 Market-based	26.76	14.13	6.1	As part of ongoing efforts to source 100% of energy from renewable sources, by the end of 2025, the Group has transitioned the majority of its meters under operating control to renewable tariffs. The remaining meters will transition to renewable energy during 2026.
Scope 3	32,787.51	19,016.76	18,001.0	The vast majority of scope 3 emissions relate to category 3.1 Purchased Goods and Services. Between 2022 and 2025, ongoing efforts have been made to improve calculation methodology, including by engaging with key suppliers to obtain supplier-specific emissions data. With improved data accuracy, the Group will now focus on identifying opportunities to reduce the energy intensity of its downstream emissions through sustainable procurement practices. As the accuracy of our reported scope 3 emissions has evolved, we will perform an assessment on the appropriateness of re-baselining our net-zero goals due to material improvements in methodology.
Intensity Ratio (tCO2e / £000 Revenue)	0.084	0.044	0.032	To supplement our SBTi-validated absolute targets, we utilise intensity ratios to track the carbon efficiency of our growth. Given the inherent link between commercial scale and Scope 3 emissions, reducing our carbon intensity is a strategic priority. This approach ensures we are delivering on our decarbonisation commitments by embedding decarbonisation strategies across our value chain as we grow.

Near-term Target Progress

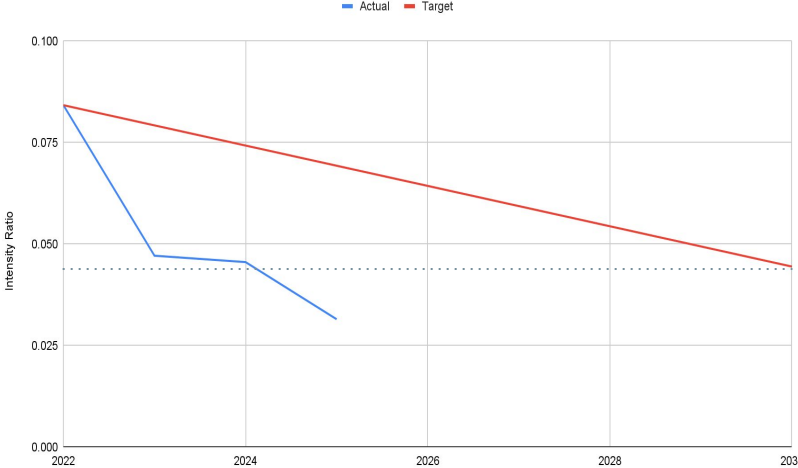
Based on our total emissions for FY25, the group has made material progress towards its near-term targets, surpassing our targeted reduction for 2030. As outlined on page 7, we recognise that this progress towards near-term targets has in part been driven by significant scope 3 category 3.1 emissions reductions, resulting from improvements to data accuracy over the 2025 period. As such, going forward we will assess our need to reassess our baseline year emissions targets in line with these data accuracy improvements, in order to further enhance the transparency of our net-zero targets.

Further, as the group continues to grow, we will focus on continuing to reduce the intensity of our emissions and identifying opportunities to work with key stakeholders to decarbonise our supply chain.

Actual vs Target - Total Emissions



Actual and Target - Intensity Ratio (tCO2e per £100k revenue)



Governance

Board Oversight

The Board has overall responsibility for overseeing the Group's climate-related strategy and transition plan. This includes consideration of climate-related risks and opportunities, progress against transition objectives, and alignment between the transition plan and the Group's broader business strategy.

The Board receives quarterly updates on climate-related matters, including progress against emissions reduction initiatives, material risks and dependencies, and key developments that may affect delivery of the transition plan.

Management Responsibility

Day-to-day responsibility for implementing the transition plan sits with senior group management. Relevant executives are accountable for delivery of actions within their areas of responsibility, including operational efficiency, procurement, technology infrastructure, and supplier engagement.

Climate-related considerations are embedded within existing management processes, including business planning, investment decisions, and risk management, to ensure that the transition plan is integrated into core decision-making.

Integration with Risk Management

Climate-related transition risks and opportunities are assessed through the Group's existing enterprise risk management framework. Material climate-related risks are identified, evaluated, and monitored alongside other strategic and operational risks.

Where relevant, climate risks are escalated to senior management and the Board, and mitigation actions are considered as part of ongoing business planning and governance processes.

Incentives and Performance Monitoring

The Group monitors progress against its transition plan using defined metrics and targets. Performance against climate-related objectives are not currently embedded alongside other strategic priorities in management performance discussions.

The Group will continue to assess the appropriate use of incentives to support delivery of its climate objectives, recognising the importance of aligning accountability with the maturity of data, targets, and internal capability.

Governance

Review and Continuous Improvement

The governance arrangements supporting the transition plan will be reviewed regularly to ensure they remain appropriate as the Group's strategy, regulatory environment, and external expectations evolve.

The transition plan itself will be updated as required to reflect changes in business activities, improvements in data quality, and progress against stated objectives.

Board sign off

This transition plan has been reviewed and approved by the board of directors, and will be reviewed and updated as required every 3 years.

Appendix A

Baseline year data

The 2022 baseline year data has been used as basis of the group's SBTi-validated net-zero targets.

	2022
	tCO₂e
Scope 1	
Mobile Combustion	31.68
Fugitive Emissions - Refrigeration	72.43
Stationary Combustion	12.01
	116.12
Scope 2	
Location Based	
Purchased Electricity - Facility	213.4
Market Based	
Purchased Electricity - Facility	26.76
Scope 3	
Cat 1	32,313.40
Cat 2	60.01
Cat 3	75.5
Cat 5	3.93
Cat 6	85.11
Cat 7	234.08
Cat 8	15.48
	32,787.51
	33,117.03

Appendix B

Group Entities

Businesses included within this group-level transition plan

- uSwitch
- [Confused.com](https://www.confused.com)
- [Money.co.uk](https://www.money.co.uk)
- Mojo Mortgages
- Tempcover
- Zoopla
- Hometrack Data Systems
- Calcasa
- Alto Software Group