

Climate Transition Plan

CEO's introduction

Putting the brakes on carbon



Nathan Coe
Chief Executive
Officer



**AUTO TRADER'S
ROADMAP PODCAST**
'Life as a CEO of a
tech company'

We're pleased to present our first carbon transition plan, providing us the opportunity to share more detailed plans as to how we plan to achieve our net zero by 2040 ambition. Our purpose is driven by our commitment to doing the right thing, measuring, and reporting transparently and always acting with integrity.

As a technology company, we have a relatively small carbon footprint which is sustainable in a low carbon environment. However, we operate in the automotive industry which is significantly impacting the climate, and as the leading marketplace we have a responsibility to do what we can to support the industry in reducing its impact on the environment.

As the UK's largest automotive platform, we recognise the importance of making sustainability a business priority. We know that we will only succeed as a business if we use our technology, expertise and data to help solve the challenges our customers, consumers, and the industries we operate in face.

Our ESG strategy focuses on the material issues that have the greatest impact on our business while considering the expectations of our stakeholders. Our ESG strategy considers the impact our decisions have more widely on the environment, our people and society.

"As the UK's largest automotive platform, we recognise the importance of making sustainability a business priority."

Our environmental strategy is putting the brakes on carbon, not only across our own operations and supply chain, but also by: using our capabilities and voice to influence government shaping the policies required for an equitable transition to electric vehicles; helping consumers to make more environmentally friendly vehicle choices; and supporting the industry at large with their own sustainability ambitions.

The nature of the risks and opportunities that we face depends not just on the physical aspects of climate change, but also on transition risks. These are driven by the trajectory of our customers, consumers and suppliers in responding to climate change and the regulations applied to the market we operate in. Therefore, we recognise that our path won't be linear and will rely on many other externalities, but we are committed to driving change together, responsibly.

Nathan Coe
CEO
29 May 2025



plc.autotrader.co.uk

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The environment



The environment

Our Climate Transition Plan – a strategic roadmap to a sustainable future.

Developing a climate resilient strategy aligned to the UK's ambitious environmental targets and which aims to minimise future risks, capture opportunities and protect our business from the impact of climate change.

SUPPORTING THE UN SDGS MOST RELEVANT TO OUR STRATEGY

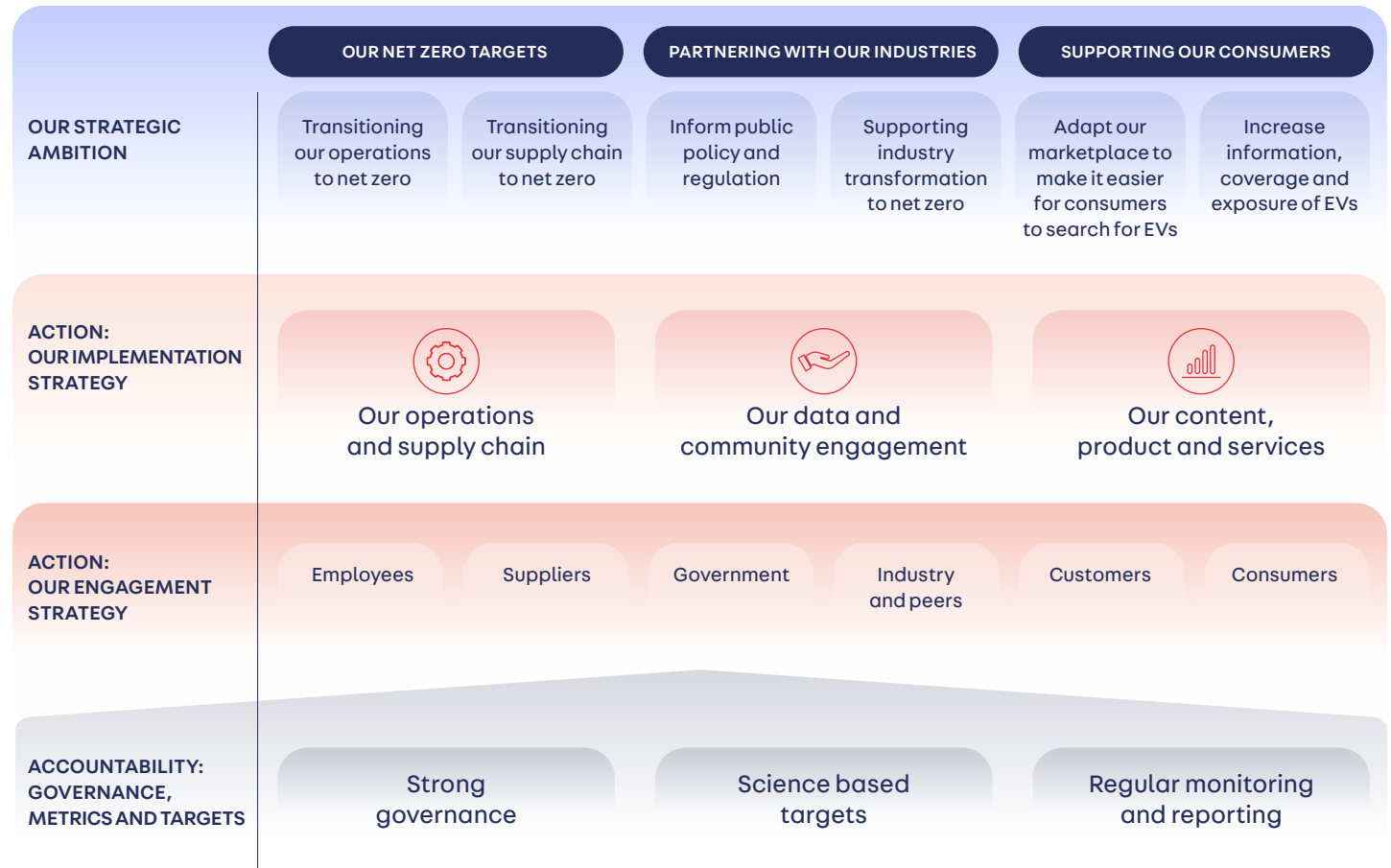


We are pleased to publish our first Climate Transition Plan ('CTP'). Its aim is to outline our role in the transition to a net zero economy. We will review our transition plan at least every three years in line with the Transition Plan Taskforce ('TPT') recommendations, and provide updates on our progress on an annual basis.

The UK has set itself ambitious targets to cut greenhouse gas ('GHG') emissions to net zero by 2050. As a responsible business Auto Trader has a role to play in reaching this goal. We are committed to reaching net zero in our own operations by 2040 – we recognise, however, that we have a small carbon footprint, so we

focus equally on areas outside of our emissions measure, including the industry and the cars listed on our platform. We can help drive change by using our capabilities and voice to contribute to an economy-wide transition, supporting the UK Government and the automotive and technology industries.

OUR CLIMATE TRANSITION PLAN AT A GLANCE





Ambition

Ambition

Our strategic ambition is to minimise our impact on the environment, thereby protecting our business from the impact of climate change.

TAKING A STRATEGIC AND ROUNDED APPROACH

Our strategy is '**Putting the brakes on carbon**', not only across our own operations and supply chain, but also by using our capabilities and voice to influence the automotive and technology industries to support others in the transition to a low carbon economy.

As the world transitions to a low carbon economy, regulatory change and changes in consumer behaviour will have an impact on the automotive and technology

industries. We need to continue to develop and adapt our business strategy to incorporate climate resilience. Reducing the impact our business has on the environment is embedded into our wider business strategy of acting responsibly and we are committed to being a net zero business by 2040.

As well as reducing our own emissions, our strategy also focuses on raising environmental awareness with both our customers and consumers, encouraging them to reduce their own environmental

impact. We use our breadth of expertise, data and market insight to accelerate the transition to low carbon transport. Another key part is sharing our data and insights with Government to help inform public policy and regulation to support the mass adoption of electric vehicles.

Failure to deliver on our environmental commitments could negatively impact our brand as a responsible business or result in regulatory sanctions.

By 2030
(from 2023 base year)

50%
reduction in
emissions we control
(Scope 1 and Scope 2)

46.2%
reduction in
emissions we influence
(Scope 3)

By 2040
(from 2023 base year)

90%
reduction in all emissions
(Scope 1, Scope 2
& Scope 3)

NET ZERO

As defined by the SBTi: Reduce emissions by at least 90% to reach net zero. Then, any remaining emissions (usually no greater than 10% of base year emissions) must be neutralised through carbon removals. Our 2040 targets to reduce all emissions by 90% have been fully validated by the SBTi.

Ambition continued

Putting the brakes on carbon

Our strategic ambition is covered across three key focus areas, with robust governance underpinning them:



Our operations

Our aim is to be net zero by 2040. We will do this by:

- Embedding a culture of sustainability to ensure all employees can contribute to our net zero goals through their roles.
- Minimising the environmental impact of our offices and company cars.
- Engaging with our suppliers and other stakeholders in our value chain to support them in the transition to a low carbon economy.
- Continuing to identify and respond to climate related risks and opportunities that arise from the transition to a low-GHG emissions, climate-resilient economy.



Partnering with our industries and influencing the UK Government

Our aim is to influence the Government, and partner with and support the automotive and technology industries in their own transition towards a low carbon economy by:

- Using our breadth of expertise, data and market insight to accelerate the transition to low carbon transport.
- Sharing our data and insights with retailers, the broader automotive industry and Government to help inform public policy and regulation to support the mass adoption of electric vehicles.
- Collaborating with the automotive and technology industries to support their own sustainability journeys with our partner, The Carbon Literacy Project.



Supporting consumers

Our aim is to support consumers to make more environmentally friendly vehicle choices which means we will focus on:

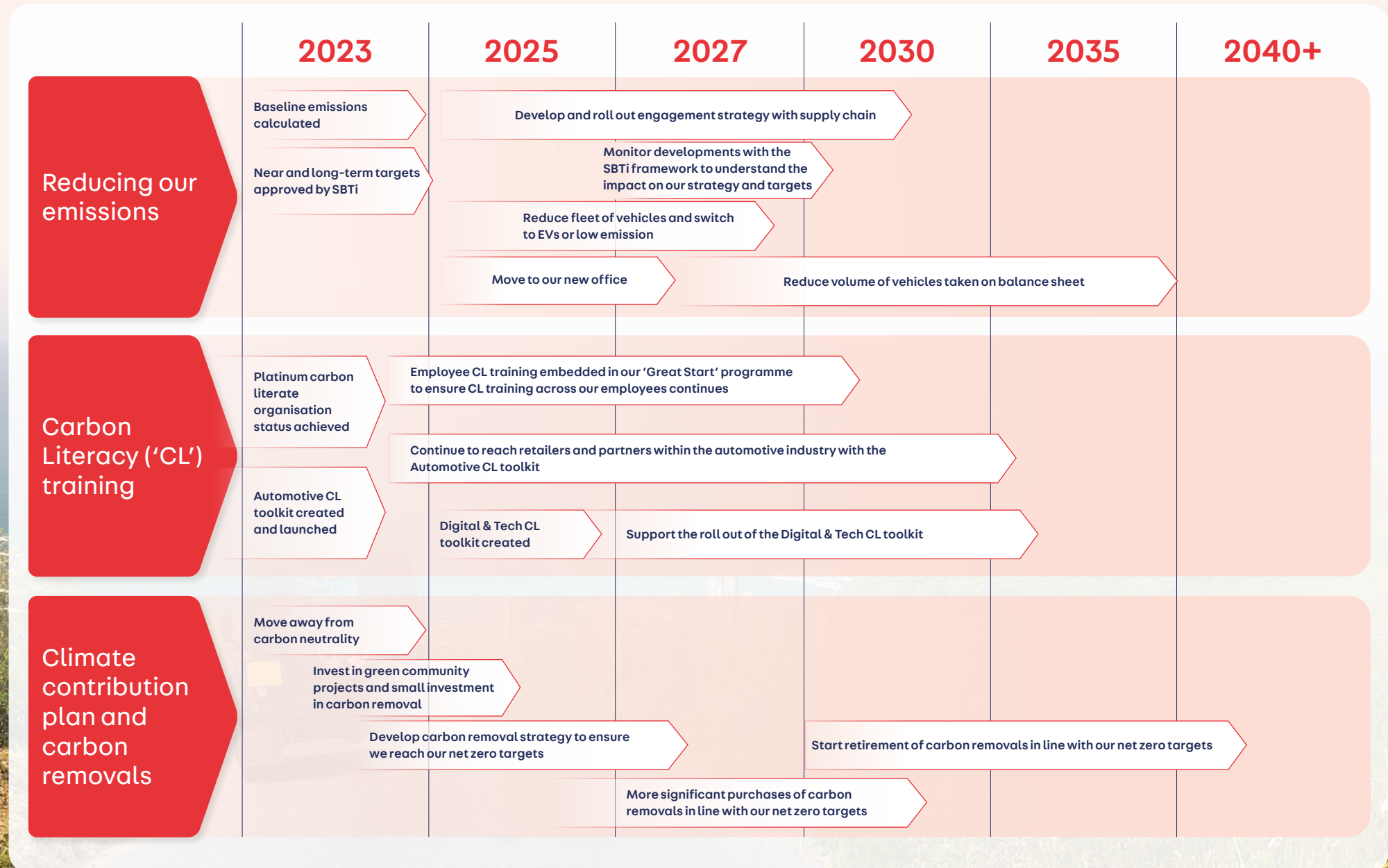
- Normalising sustainable choices through surfacing content and information on our site to grow consumer confidence around electric vehicles ('EVs').
- Developing reviews and YouTube videos that help to educate and inform car buyers about EVs.
- Promoting EVs as part of our wider marketing activity, including our monthly EV giveaway.
- Sharing 'The Facts' about owning and running an EV with consumers via owned and earned channels.

Governance

We have integrated climate governance into our existing governance processes and sought to embed responsibility for the risks associated with climate change throughout our business, adopting a climate change focused mindset.



Ambition continued



Ambition continued

ADAPTING OUR MARKETPLACE

As an online marketplace, our direct GHG emissions are low in comparison to other industries. However, the automotive industry holds a key role in tackling climate change and there is pressure from consumers and Government to reduce its impact on the environment. We can influence positive societal change through our content, and encourage positive climate action amongst our audiences.

Auto Trader is uniquely positioned to accelerate the transition towards a low-GHG emissions and climate resilient economy. The transition to a low-carbon economy requires us to evaluate our operations and also adapt our marketplace to meet the changing preferences of all car buyers. This means changing the way we work, how we support our customers and our consumers and how we partner with our wider industries. We have the opportunity to do this by positively supporting our customers and audiences through our marketplace, our content and by working with the automotive industry and Government bodies to shape the transition towards mass adoption of EVs.

See 'Our implementation strategy' and 'Our engagement strategy' sections for more detail on page 41 and page 45.

CONSIDERING NATURE WITHIN OUR PLAN

The Taskforce on Nature-related Financial Disclosures ('TNFD') has developed a set of disclosure recommendations and guidance that encourage and enable businesses to assess, report and act on their nature-related dependencies, impacts, risks and opportunities. Climate and nature are inherently connected and it is important that we seek to understand how nature-related risks could affect our operations and financial performance. We are at the very early stages of considering nature-related risks and a nature-positive strategy, with a view to reporting on these in the future in line with the recommendations from the TNFD.

DEPENDENCIES

Achieving our strategic ambition and reaching our net zero targets are both dependent on external factors. These have informed our implementation and engagement strategies and we will need to continually monitor these as we work towards achieving our goals.



EXTERNAL FACTORS

Broad external dependencies	Sector factors Industry trends	Value chain factors Suppliers and customers
Government policy	Technology & innovation	Data quality
UK Government policies, new decarbonisation reporting requirements and regulation put in place to govern the electric vehicle transition and the UK's net zero target.	Advancements in technology, including hardware and software, that will enable better outcomes.	Accurate data on operational and supplier emissions, as well as the ability to use this to report progress, and disclose externally.
Global decarbonisation	Consumer behaviour	Supplier commitments
Worldwide momentum towards net zero and the required structural changes which are impacted by a variety of factors, such as the impact of geo-politics on decarbonisation.	Consumer opinion on climate change and the effect this has on their perceptions of the electric vehicle transition.	Suppliers committing to align with our net zero ambition by establishing their own reduction targets and transition plans.
Global economy	Industry collaboration	Customer behaviour
How the global economy impacts our customers, our sector and our place in it and what this means for our ability to progress our decarbonisation goals.	Industry-wide collaboration, including the sharing of best practice, supplier referrals and consistency of messaging both to internal (employees) and external (consumers) audiences.	Our customers' attitudes to decarbonisation, going above and beyond the electric vehicle transition.

RISK MANAGEMENT

The Board is collectively responsible for determining the nature and extent of the principal risks which may impact the business. Our risk management framework, including the processes for identifying, assessing and managing risk, is described on pages 62 to 63 and the Board recognises climate change as one of Auto Trader's principal risks (see page 66).

Auto Trader plays an important role within the UK automotive ecosystem and climate change is a catalyst for unprecedented change within our industry. This mainly relates to the transition from ICE vehicles to Zero Emission Vehicles ('ZEVs') which could result in significant changes to automotive retail. We are working hard to support the industry with this transition, from providing content to help consumers 'demystify' EVs, to lobbying Government to incentivise the transition and sharing our data and insights to inform Government policy over EVs.

Internally, climate change also poses a threat to our business and to our supply chain, including via regulatory change. It is therefore critical that our risk management process considers climate change if we are to understand its impacts both on our business and on the automotive industry as a whole.

Our risk management process approach allows for the continual identification and assessment of climate related risks. We maintain an environment/climate risk register which is reviewed regularly by the risk register owner, their delegates and our risk management team. Each climate related risk is assigned an owner and controls and/or mitigating actions are recorded against each risk.

Ambition continued

ASSESSING CLIMATE RELATED RISKS AND OPPORTUNITIES

In order to protect our business from the challenges of climate change, we must build climate resilience into our business strategy by identifying climate related risks and opportunities.

As an online marketplace, we have a relatively small carbon footprint and our business model is sustainable in a low carbon environment. However, the automotive industry is intrinsically linked with climate change and there is pressure from consumers and Government for the industry to reduce its impact on the environment. The nature of the risks and opportunities that we face depends not just on the physical aspects of climate change, but also on transition risks.

These are driven by the trajectory of our customers and consumers in responding to climate change and the regulations applied to the market we operate in.

Our climate related assessment of the risks and opportunities posed by climate change and how they might impact our business has provided a firm foundation on which to build our environmental strategy and resilience. We considered the transitional and physical climate risks and opportunities presented by rising temperatures, climate related policy and emerging technologies. We agreed the methodology for assessing and quantifying financial impacts.

To ensure we understand the potential impact of plausible future states, in accordance with the TCFD recommendations, we have used climate scenarios to explore how potential climate risks and opportunities could evolve and impact our business over the short, medium and long term. In each case, the likely impact on costs or revenues was reviewed. We have assessed how the risks can be better managed, reduced or mitigated in line with the Group's risk management framework and business strategy. The risks identified during our analysis are more likely to present themselves in the medium or long term.

Having assessed and modelled the risks, we believe that there is no immediate material financial risk or threat to our business model. The results of our scenario analysis showed that based on our strategic plans and capabilities, we remain well positioned to mitigate the risks and seize the opportunities related to climate change. Even though there is uncertainty around the time horizon over which climate risks will materialise, stakeholder expectations and regulatory attention could develop at pace, impacting the rate at which the business may need to cut carbon emissions. We recognise that we will need to keep abreast of future climate change legislation as well as consumer preferences and retailers' ability to adapt. However, we have a strong track record of quickly evolving.

KEY TRANSITION RISKS:

Regulatory changes: Emissions regulations and Government policies favouring EV adoption may impact manufacturers' production strategies which will impact supply and therefore stock available to list on Auto Trader's platform.

Supply chain disruptions: Dependency on complex global supply chains exposes the industry to risks related to geo-political tensions, natural disasters, pandemics, tariffs and risks delaying new cars entering the UK, which can impact supply for retailers and therefore impact Auto Trader.

Consumer preferences: Changes in consumer preferences towards sustainable transportation options and shared mobility services could impact the desire to own a car outright, challenging the number of new and used car transactions made each year.

KEY PHYSICAL RISKS:

Extreme weather and climate related natural disasters: Extreme weather could impact our cloud providers which could impact platform performance. We could also see customers' ability to open their showrooms impacted, which risks their ability to sell vehicles.

Resource scarcity: Shortages of critical materials like rare earth metals and lithium could disrupt production of electric vehicles and their components, impacting supply of the vehicles into the UK and available stock on Auto Trader's platform.

Geo-political instability: Political unrest, trade tensions, tariffs and sanctions can disrupt international supply chains and increase production costs for automotive manufacturers, which risks the amount of vehicles they'll choose to sell in the UK and therefore impacts Auto Trader's new car stock offering.

Navigating these risks will require adaptation, innovation and strategic planning as well as robust risk management strategies and contingency planning.



CLIMATE SCENARIOS:

Hot house world (>2°C)	Orderly transition (1.5°C)
<ul style="list-style-type: none"> Assumes business as usual, some climate policies are implemented but efforts are insufficient to halt significant global warming Continuation of current projection of carbon emissions with little or no abatement or mitigation 	<ul style="list-style-type: none"> Assumes climate policies and legislation are introduced early to limit climate change and become gradually more stringent Both physical and transition risks are relatively subdued

IMPACT TIME HORIZONS, ALIGNED TO OUR BUSINESS PLANNING CYCLE:

Short term 0-5 years	Medium term 5-10 years	Long term 10 years +



Ambition continued

Climate related scenario analysis

Impact	Mitigation/response		Financial impact			Inherent likelihood
			Minor	Moderate	Major	
			Short term 0-5 years	Medium term 5-10 years	Long term 10+ years	
PHYSICAL RISK – Increased frequency/severity of extreme weather and climate related natural disasters						
<ul style="list-style-type: none">Offices closedCloud infrastructure providersCustomers cannot open their showrooms	All technology infrastructure is cloud based. Disaster recovery/business continuity planning in place, including tools and guidance to support our people in emergency situations. COVID-19 proved the sales process can be completed without physical showrooms, plus development of digital retailing will enable all retailers to compete on our digital marketplace.	>2°C				Low
		1.5°C				
<ul style="list-style-type: none">Weather has the potential to disrupt the supply chain and limit vehicles entering the UK car parc	We have experienced the impact of disrupted supply chains as a result of recent external catastrophic and geo-political events. These significant supply side challenges have constrained new and used car transactions for much of the past four years. However, our business has remained healthy as market dynamics have adjusted and OEMs and retailers learnt to adapt their business models. We would anticipate weather related disruption to be more intermittent and comparatively less severe than the disruption caused by recent events.	>2°C				Low
		1.5°C				
<ul style="list-style-type: none">Costs – increased operational costs such as heating/aircon, insurance, cloud costs	In order to have a significant impact on our business, costs would need to increase significantly. We are continually reviewing our cost base such that any increases can be managed.	>2°C				Medium
		1.5°C				
TRANSITION RISK – Increased regulation relating to climate change						
<ul style="list-style-type: none">Existing UK regulation banning the sale of new internal combustion engine ('ICE') vehicles from 2035, with the industry already working towards this milestone	We already closely monitor the implementation of policies related to our core business. We will continue to monitor policies with a view to identifying potential risks and opportunities and related financial impacts. We are already evolving our product offering and provision of information to support the effectiveness of EVs on our marketplace and will continue to meet changing preferences of car buyers.	>2°C				High
		1.5°C				
<ul style="list-style-type: none">Increased regulatory scrutiny and introduction of new legislation could result in increased reputational risk but also increased compliance costs. Failure to deliver against our environmental commitments would undermine our reputation as a responsible business and may result in loss of revenue, legal exposure or regulatory sanctions	We have formed a Corporate Responsibility Committee to oversee our environmental strategy and commitments. We will report in line with the TCFD recommendations and report progress towards our net zero ambitions against our science based targets.	>2°C				Low
		1.5°C				



Ambition continued

Impact	Mitigation/response		Financial impact			Inherent likelihood
			Minor	Moderate	Major	
			Short term 0-5 years	Medium term 5-10 years	Long term 10+ years	
TRANSITION RISK – Regulation discouraging the use of internal combustion engine ('ICE') vehicles						
<ul style="list-style-type: none">Cost of ownership increases, making ICE vehicles less appealingConsumers stop buying petrol or diesel vehicles, demand switches over to electricIf EVs remain expensive some consumers could be priced out of the market presenting a risk to demand	We will continue with our strategy to adapt our marketplace to meet changing preferences of all car buyers. It is likely that used car prices will continue to move in line with supply and demand dynamics such that lower demand will make vehicles more affordable.	>2°C				Low/Medium
		1.5°C				
TRANSITION RISK – Demand for sustainable products and services						
<ul style="list-style-type: none">Consumers' preferences shift away from ICE vehicles; steep decline in purchase of petrol or diesel vehicles in favour of EVsPotential opportunity: Support our audience to find the sustainable options they are seeking	We will continue with our strategy to adapt our marketplace to meet changing preferences of all car buyers and continue to be the largest marketplace for EVs.	>2°C				Low/Medium
		1.5°C				
TRANSITION RISK – Increased reputational risk associated with the automotive industry and misrepresenting environmental claims						
<ul style="list-style-type: none">As consumer consciousness around climate change rises, there is increased scrutiny on our industry's role on the environmentFailure to appropriately demonstrate that as a business we are committed and moving towards net zero carbon emissions could negatively impact our brand and also impact our ability to operate and/or remain relevant to our customers and consumers	As part of our goal to be net zero by 2040 we will focus on our own operational footprint and also on how we can positively support our industry. We have set clear reduction targets for our own operations and report progress to stakeholders. We work with customers, suppliers and the industry on education and policy.	>2°C				Low
		1.5°C				
TRANSITION RISK – Achieving resource efficiency through cutting our carbon footprint and improving energy efficiency						
<ul style="list-style-type: none">Reduced costs associated with energy use and avoid increased costs associated with carbon taxation	Reduction initiatives to reduce our absolute usage, including successfully moving our technology infrastructure to the cloud.	>2°C				Medium
		1.5°C				
TRANSITION RISK – Increased reputational risk associated with the automotive industry and misrepresenting environmental claims						
<ul style="list-style-type: none">Consumers may stop buying vehicles if they no longer require onePotential opportunity: Consumers' desire/need to switch to EV	Likely the risk and opportunity would be taken together, and stock/demand would be maintained as the desire for personal transportation/vehicle ownership remains strong. We will continue with our strategy to adapt our marketplace to meet changing preferences for all car buyers and continue to be the largest marketplace for EVs.	>2°C				Low/Medium
		1.5°C				

OUR FUTURE FOCUS

We intend to periodically review the scenarios and timeframes we choose to apply in our analysis and refine them as needed. The risk management recommendations arising from our climate change scenario analysis were:

- Policy/regulation: It is likely that increased policy and regulation will have the most significant financial impact on Auto Trader over the longer term. The most significant action we can take is to reduce our exposure to this risk and continue with our strategy to adapt our marketplace to meet the changing preferences of all car buyers. We also need to make sure we continue to remain abreast of regulatory requirements to ensure we are compliant with all relevant reporting obligations.

- Market: Driven by its net zero ambitions, the Government announced the ban on the sale of new petrol and diesel vehicles by 2035, and this is already changing the make up of the car parc as consumers begin to buy electric vehicles as an alternative.

Auto Trader can mitigate this risk by continuing to develop its strategy to be the destination of choice for consumers searching for a more environmentally friendly vehicle.

Action: Our implementation strategy

Action: Our implementation strategy

We are taking action in our business operations, portfolio of services and policies to achieve our strategic ambition. Our aim is to embed a culture of sustainability across the business.



SUSTAINABILITY NETWORK AND DIGITAL SUSTAINABILITY WORKING GROUP

Our Sustainability Network comprises passionate individuals from across the business who are focused on making life at Auto Trader more sustainable through increased employee awareness and driving impactful changes for our business.

More recently, our Digital Sustainability working group ('DSWG') has been formed. The aim of the DSWG is to focus on raising internal awareness of digital sustainability and provide reliable resources for employees to learn more about digital sustainability. This will encourage and enable employees to identify how we can adopt a more digitally sustainable approach to our products. A key aim for the DSWG is to embed sustainability across the various technology disciplines within Auto Trader such as design, marketing and development, with the goal of understanding what each team creates, the tools and processes they use, and identify opportunities to embed and advocate for sustainable solutions in these areas.

MORE SUSTAINABLE DATA MANAGEMENT PRACTICES

In 2024 we finalised the migration of our data centres to the cloud which should result in less energy consumed to store our data compared to physical data centres. However, this move to the cloud also needs to be complemented with how much data we are storing. We are implementing specific initiatives across our business that focus on storage and data retention. This includes understanding how much storage we use across all of our tools and reviewing our data retention policies. Evaluating how we manage, store and dispose of data will contribute towards minimising our environmental impact. We are implementing and automating data retention policies to minimise storage capacity and we are also raising employee awareness of how digital waste contributes to our environmental impact.

PRODUCTS AND SERVICES

Although our direct impact on global GHG emissions is low, through our reach we are in a unique position to make a positive difference to our customers and users of our marketplace.

The market for electric vehicles ('EVs') continues to grow; supply and demand for electric cars has grown materially over the last 12 months and it's important that our experiences evolve to meet this growing need. One step we have taken towards making electric cars easier to find on Auto Trader is to elevate the filters specific to EVs; where previously they were only shown if 'fuel type: electric' was selected, they are now shown by default. This makes it easier to find an EV with a suitable range. Alongside this change, we have introduced explainer copy within the EV filters, acknowledging that a number of buyers will be transitioning from traditional petrol/diesel vehicles to EV and will need more context and confidence to make the right decision for them.

As the market for EVs continues to grow, in order to meet the changing preferences of car buyers we must continue to evolve our product offering and provision of information to support the effectiveness of EVs on our marketplace and meet the needs of car buyers.

Dark Mode for our Auto Trader app was successfully rolled out in August 2024. This feature, now used by nearly half of our app users (either through system defaults or manual selection) consumes less energy and has received positive user feedback. As part of our design system evolution, we are implementing a comprehensive tokenisation of the Auto Trader colour palette, including Dark Mode colours.

Auto Trader is proud to be certified under the IAB Gold Standard. This shows our commitment to promoting sustainability by reducing carbon emissions from ad loads on our pages.

We strictly adhere to a creative acceptance policy for all media advertisers to ensure ad loads are kept to a minimum across all platforms and this is constantly reviewed. Furthermore, we have ceased carrying programmatic advertising from third parties to ensure that page loads remain minimal and on-site user experience is positive.

We are exploring ways to measure the carbon footprint of our on-site media advertising and are actively engaged in discussions with the IAB and ISBA to determine how best to achieve this.

See 'Our engagement strategy' section for more details on how we have evolved our content to support the transition to EVs (page 45).

The market for electric cars continues to grow with 50% more EVs advertised than this time last year and our experience needs to evolve to reflect this.



Action: Our implementation strategy continued

SCOPE 1 AND SCOPE 2 EMISSIONS

A key part of our environmental strategy has always been to reduce the emissions directly generated from our operations and facilities.

Over recent years we have been decreasing our Scope 1 and Scope 2 emissions through various actions as set out in the table opposite and we continue with targeted action to further reduce our direct emissions.

OUR POLICIES

Our policies provide a framework to guide employees, suppliers and other stakeholders in improving our environmental performance and reaching our climate ambitions:

- Environmental Policy – Reflects our commitment to protect the environment and support the low-carbon transition.
- Ethical Procurement Policy – We want to engage suppliers that share our values to build a stronger and more responsible supply chain.
- Supplier Code of Conduct – Sets out our expectations of all our suppliers.
- Travel Policy – Sets out requirements for our employees to travel more sustainably.

Metric	Scope	Implemented or planned activities	Timeline
Switch 100% of our fleet vehicles (Auto Trader and Autorama) to be EV or low emission	SCOPE 1	<ul style="list-style-type: none"> • 12 remaining vehicles, all of which are fully electric or hybrid. • We have a salary sacrifice scheme for employees available to those who need to drive as part of their role, providing EVs as a sustainability benefit. 	 IMPLEMENTED
Energy: reduce overall electricity/gas usage by 50% (against a 2023 baseline) and procure 100% renewable energy for our remaining needs	SCOPE 1	<ul style="list-style-type: none"> • All of our offices are on renewable energy tariffs. 	 IMPLEMENTED
	SCOPE 2	<ul style="list-style-type: none"> • In all our offices, lighting has been upgraded to LED light bulbs and sensors installed so that lighting is activated by movement. 	 IMPLEMENTED
		<ul style="list-style-type: none"> • We have started to roll out standardising to new Apple products, which has allowed us to take a more holistic approach to reducing the carbon lifecycle of our employee focused technology. The products themselves have a substantially lower lifetime carbon footprint and are also much more efficient from a power usage perspective which means less charging. We are also able to reduce the amount of underlying tech infrastructure which is required when having both PCs and Apple products. 	 IN PROGRESS
		<ul style="list-style-type: none"> • Hemel Hempstead office – This year we completed a large solar panel installation in September, replacing a smaller number of older panels. Rather than disposing of these, they were donated to a charity via our installer (Solarsense), and we made a further donation towards the recycling and reinstallation at Draycott Memorial Hall. 	 IMPLEMENTED
		<ul style="list-style-type: none"> • Further enhancements to the Hemel Hempstead office have been identified as part of our ESOS Phase 3 action plan: <ul style="list-style-type: none"> - install pipe and valve insulation. - lighting upgrade. 	 PLANNED
Migrating our data centres to the cloud		<ul style="list-style-type: none"> • London office – we reduced floorspace at our London office. 	 IMPLEMENTED
		<ul style="list-style-type: none"> • In 2026 we will be relocating our head office to state-of-the-art facilities in the heart of Manchester's tech community. Auto Trader is passionate about being a responsible technology business. The move to No.3 Circle Square will help Auto Trader in meeting our net zero goals as sustainability is one of the core principles in its design. The building will be net zero embodied carbon in both its construction and shared spaces, and is expected to achieve BREEAM Excellent status, as well as a NABERS 5-star rating and an EPC A rating. 	 IN PROGRESS
		<ul style="list-style-type: none"> • As part of the move to our new office, we will plan to re-use existing furniture where possible as opposed to buying new and will work with existing partners to donate or recycle items we will not take with us. 	
Review of our data retention policies	SCOPE 2	<ul style="list-style-type: none"> • We have been reviewing how we store data in each of our productivity suite solutions (including Office 365, Slack) and implementing changes which will help us save on storage, energy and productivity. 	 IN PROGRESS

Action: Our implementation strategy continued

SCOPE 3 EMISSIONS

One of our strategic objectives is to transition our value chain to net zero emissions, bringing suppliers on the journey and embedding sustainability within our procurement processes. We calculate all relevant Scope 3 emissions, including those relating to suppliers. We are improving our data quality, using activity data where possible (as opposed to spend data), and will continue to get enhanced data as we continue to measure our emissions.

We are taking action to address our Scope 3 emissions. With the majority of our total greenhouse gas emissions attributed to spend within our supply chain in our baseline year, engagement with our value chain is crucial to achieving our carbon reduction goals.

The key actions that we are taking, or plan to take, within our value chain to achieve our Scope 3 targets are outlined opposite:

Metric	Scope	Implemented or planned activities	Timeline
Gathering supplier data and adapting procurement processes	SCOPE 3.1	• We have implemented a new supplier engagement strategy to collate information from suppliers which provides greater insight into aspects of their performance, including ESG practices. Ethical procurement questionnaires covering c.75% of our supplier spend have been completed.	IMPLEMENTED
		• We will develop a clear plan for enhancing supply chain emissions data further to improve our Scope 3 emissions calculations relating to purchased goods and services.	IN PROGRESS
		• Develop guidance for supplier selection criteria specifically relating to climate.	PLANNED
Engaging suppliers	SCOPE 3.1	• We have expanded our discussions on sustainability with the suppliers who account for our highest carbon emissions, to understand where our suppliers are on their own sustainability journeys, recording if they are monitoring and reporting emissions and what scopes are included in a supplier's own reporting.	IMPLEMENTED
		• Develop a plan for sharing knowledge and learnings with suppliers that are seeking to improve their environmental maturity.	PLANNED
Sustainable capex	SCOPE 3.2	• Refurbishment of our offices – where possible, we recycle furniture and/or donate unwanted furniture to local communities/organisations. This same policy will apply when we relocate to our new offices.	IMPLEMENTED
		• Standardising to new Apple products including specifically the Mac Air range has allowed us to take a more holistic approach to reducing the carbon lifecycle of our employee focused technology. The products have a substantially lower lifetime carbon footprint than the equivalent PCs we have purchased in the past and are also much more efficient from a power usage perspective which means less charging.	IN PROGRESS
Business travel	SCOPE 3.6	• Our Travel Policy has been updated to make flights as a mode of travel by exception.	IMPLEMENTED
		• Employees with a company car allowance are required to have an EV/low emission (75g/km or less for a hybrid) vehicle.	
		• Salary sacrifice scheme introduced for employees to lease an EV or low emission hybrid vehicle in a tax efficient way.	
		• Our travel booking system has been updated to display carbon emissions associated with bookings to make employees more aware of the impact their journeys are having.	
		• We have invested in video conferencing equipment in our offices to facilitate enhanced virtual meetings and collaborative online working.	
Purchased vehicles	SCOPE 3.1 SCOPE 3.10 SCOPE 3.11	• Develop a clear plan for reducing the volume of vehicles taken on balance sheet through Autorama.	IN PROGRESS

Action: Our implementation strategy continued

PURCHASED VEHICLES – LEASING

A significant part of the Group's Scope 3 emissions relate to the purchased vehicles that temporarily pass through Autorama's balance sheet. This significantly impacts our emissions from purchased goods and services and use of sold goods as we account for purchase of the vehicles as well as the lifetime emissions and end of life emissions of the vehicles. As the supply of new vehicles improves, we expect to become less reliant on vehicles where we are required to take them on balance sheet.

PURCHASED GOODS AND SERVICES

We want our supply chain to align with Auto Trader's own net zero goals, and are embedding this in our sourcing, supply chain management and reporting processes. We engage our suppliers to understand their own intentions, approaches, targets and actions with a view to measure, monitor and offer support and potentially future assistance to our key suppliers.

To complement our actions across our business operations, we have set a target of reducing our absolute Scope 3 GHG emissions by 46.2% before 2030 (from a 2023 base year), a key part of which will mean addressing our supply chain emissions to ensure that our purchased goods and services are aligned to the low carbon economy transition.

We set out a clear stance on the importance of appropriate environmental action with our highest emitting suppliers. All our suppliers' emissions are tracked as part of our own calculations, and we monitor this year-on-year. We also assess our top spend and highest emitting suppliers to see what they include and how they calculate their emissions, if they

have set any targets (SBTi or other), whether they submit a report to CDP (if so, how have they scored year-on-year) and finally, what are they sharing publicly, targets, initiatives, actions and do they feel appropriate for their business type, size and industry. This information forms part of an internal rating system which indicates where a supplier is on their journey to become a more sustainable business and aids internal business decisions about the relationships we have.

FINANCIAL PLANNING

We know our transition plan requires adequate financing to succeed. While we haven't quantified its impact on our financial position yet, we expect it to involve minimal investment and in some instances will yield cost savings. For example, reusing furniture from offices which would otherwise go to waste will save costs. The purchase of carbon removals will play a role in our ability to reach net zero and therefore developing a carbon credit purchasing strategy is required for us to meet our targets.

Our Revolving Credit Facility arrangements are linked to performance against our ESG targets, including our climate targets, ensuring that there is a direct positive financial reward for staying on track with our GHG emissions reductions through reduced rates. Investors consider ESG factors in their decisions, and our strong performance on various indices reflects our progress in ESG strategy.

CARBON REMOVALS

The purchase of carbon removals plays a role in our ability to reach net zero. We are developing a carbon credit purchasing strategy to align our purchase of carbon removals with our targets to meet net zero. In the meantime, we have started to build a modest portfolio of carbon removals.

Provider	Category	Tonnes CO ₂ e
Ruumi Project	Sustainable Land Management	39
Highland Carbon's Loch Ness Project	Reforestation	324
The Carbon Removers / Carbon Capture Scotland	Carbon Capture and Utilisation	156
Undo	Enhanced Rock Weathering	615
The Carbon Removers / Carbon Capture Scotland	Carbon Capture and Utilisation	300

One organisation we have purchased removals from is UNDO, a project based in Scotland that uses enhanced rock weathering ('ERW') to capture and lock away CO₂ permanently from the atmosphere.

The project uses the ICROA-endorsed Puro Standard methodology to quantify high-quality, high-durability CO₂ Removal Certificates (CORCs). ICROA is the voluntary carbon market's provider of best practice guidelines.

ERW is a scalable technology with significant co-benefits to soil health and crop yields. It accelerates the natural geological process of weathering, whereby the CO₂ in rainwater interacts with silicate rocks such as basalt, forming bicarbonate ions which are transported to the ocean where it is stable over geological time. As this mineral-rich volcanic rock breaks down, it releases magnesium, calcium, potassium, phosphorus and other nutrients, increasing crop yield, raising and stabilising soil pH and ultimately reducing the need for fertilisers.

UNDO is currently establishing a range of operational partnerships that will enable the spreading of millions of tonnes of basalt each year. Its immediate aim is to spread enough rock by 2025 to remove one million tonnes of CO₂, a first step towards billion-tonne scale operations.



SCAN
TO WATCH
VIDEO

46.2%

target reduction in
our absolute Scope 3
GHG emissions

➤ ENGAGEMENT STRATEGY P14

Action: Our engagement strategy

Action: Our engagement strategy

An effective engagement strategy is essential to achieving the strategic objectives of our transition plan. We aim to influence industry change and support the net zero transition across all stakeholders we interact with.



CARBON LITERACY

We embarked on our Carbon Literacy training for all our employees in 2019, working with the Carbon Literacy Trust with the aim of increasing the carbon literacy of all our employees, providing learners with an awareness of the carbon dioxide costs and impacts of everyday activities and the ability and motivation to reduce emissions, on an individual, community and organisational basis. Over 70% of our workforce trained and we are a platinum Carbon Literate Organisation – the first FTSE 100 company to achieve this accreditation. The training has been key in engaging our employees and raising awareness of climate change across the business, contributing to better decision-making around commuting, business travel, consumption of energy, and more broadly into operational decisions such as supply chain considerations and development of our products and services.

EXTENDING CARBON LITERACY

- **Automotive Toolkit** – In 2022, we funded and launched the new Automotive Carbon Literacy Toolkit, developed in partnership with the Carbon Literacy Trust. The Toolkit contains pre-accredited training materials for organisations and staff working in the automotive sector, and has been specifically designed to engage the workforce through providing information directly related to the industry, and encouraging staff to reduce emissions within their role.
- **Digital & Tech Toolkit** – In 2025, we collaborated with the Carbon Literacy Trust and Manchester Digital to create a Carbon Literacy Toolkit for the Digital & Tech industry. The Toolkit was carefully designed to address the unique environmental challenges facing the technology industry, which in 2022 alone accounted for 62 billion kg of e-waste globally.

ENGAGEMENT WITH OUR SUPPLY CHAIN

Working with our GHG emissions calculation partner, we have a granular level view of our highest emitting suppliers. We have engaged a combination of our highest emitting and highest spend suppliers, equating to c.75% of our financial year spend. We have three main approaches to supplier engagement:

Code of Conduct (Supplier) – Our published policy outlines Auto Trader's approach and position on environmental, governance, ethical practices and social responsibility, setting out our expectations relating to sustainability and what we encourage all of our suppliers to consider. This is shared with our existing supply chain and all new suppliers we onboard.

Know Your Supplier – Auto Trader's ethical procurement questionnaire helps us establish alignment to Auto Trader's values, targets and actions. We gather information through a combination of discussion, questionnaire completion and self-service from publicly disclosed information, covering a variety of themes including community support, diversity and inclusion, governance, modern slavery and environmental action.

Supplier Sustainability Ratings – Working with our GHG emissions calculation partner, we are able to identify signals that a supplier is taking appropriate environmental action and assess whether they are leaders in sustainability action or only just starting their journeys. These are important indicators which complement the emissions we calculate and allow our decision-makers within the business to see what percentage of our overall emissions an individual supplier equates to, and assess if the supplier is taking appropriate actions to reduce their (and our) emissions over time. Ownership of GHG emissions at a relationship manager level is an important objective for Auto Trader to engage the business and drive emissions reduction at all levels within the business.

FUTURE PLANS

As we move towards 2030, we intend to develop and improve our measurement and monitoring by taking the following actions:

- Engage with suppliers in a more managed way via a technology partner, potentially our GHG emissions calculation partner (Watershed) to gather more appropriate and contextual information from different types of businesses at different points in their environmental action journeys.
- Enhance the information gathering process by working with a market-leading due diligence partner which will automate and improve the quality of information we gather, so that we can focus our resource on proactive engagement and discussions with our suppliers.
- Develop and evolve our internal policies, processes and tools to adapt to our growing requirements to work with sustainable suppliers, whilst also refreshing and improving our external approach and documentation to ensure the importance to Auto Trader of appropriate environmental action is made clear to existing and new suppliers.



Action: Our engagement strategy continued



CASE STUDY

Automotive Carbon Literacy Toolkit



**CARBON LITERACY
TOOLKIT**
'Launching the
toolkit'

"Auto Trader's support for the Automotive Carbon Literacy Toolkit has not just supported our work as a culture-change charity, but has already directly funded and catalysed at-scale the low carbon transition of hundreds of companies and thousands of staff, working in UK automotive. This work with us has both initiated and accelerated the low-carbon journeys of hundreds of organisations that we alone would never have been able to reach so quickly. This initiative and thought-leadership has supported organisations at a critical time of change for the industry and has directly moved organisations forward, already positively impacted carbon emissions, and genuinely helped "green" the UK automotive industry."

Dave Coleman

Managing Director of The Carbon Literacy Project

Digital & Technology Sector toolkit

In 2024 we launched our new Digital & Technology Sector toolkit, in partnership with Manchester Digital, in our head office to a full room of engaged and passionate people. We've had positive engagement with the toolkit since launch and we're now looking forward to expanding the reach of the project.

The work has also been recognised by sustainability title edie and they've written a case study about the project.



**DIGITAL &
TECHNOLOGY
SECTOR
TOOLKIT**

"This national toolkit is a crucial step for the tech industry as climate action becomes urgent. Developed in Manchester, it showcases our region's innovative spirit. We urge tech companies to prioritise Carbon Literacy in 2025 and thank Auto Trader and partners for making it happen."

Katie Gallagher

Managing Director at Manchester Digital

Action: Our engagement strategy continued

ENGAGEMENT WITH THE AUTOMOTIVE INDUSTRY

Supporting the industry in the electric transition

The Zero Emission Vehicle mandate came into force in 2024, causing significant levels of change in the automotive industry for manufacturers and retailers as the mandate began to dictate the portion of electric vehicles ('EVs') that brands need to sell each year or risk paying fines. A lot needs to happen in the coming years to ensure the successful mass adoption of electric vehicles. Our wealth of data and insight gives us a unique view of consumer car buying intentions, and particularly consumer EV buying intentions.

We disseminate this data through various channels, including webinars, Electric Retailing Masterclasses, and the Retailer EV Insight Hub. Our strategy segments industry partners for a tailored experience depending on confidence, exposure and appetite for change. We support independent retailers, who have no one to provide additional training on these new products, through unique events offering data, insights, expert advice, as well as test drive opportunities.

Before switching to EVs, consumers need accurate information. However, myths and misinformation have influenced their views.

To counter this, we, along with the Society of Motor Manufacturers and Traders and Charge UK, have launched an initiative endorsed by the Department for Transport. 'The Facts' provide accurate data on the price, running costs, eco-credentials, fire risks, and charging of EVs, aiming to build consumer confidence.

Our goal is to ensure a fair and equitable transition to EVs. To aid this, we researched the EV gender gap and created the report 'No Driver Left Behind: Women and the journey to electric'. This has been well-received and featured on national TV, radio and online media and has been shared throughout the industry. Multiple Government departments and manufacturers have requested sessions on this topic.

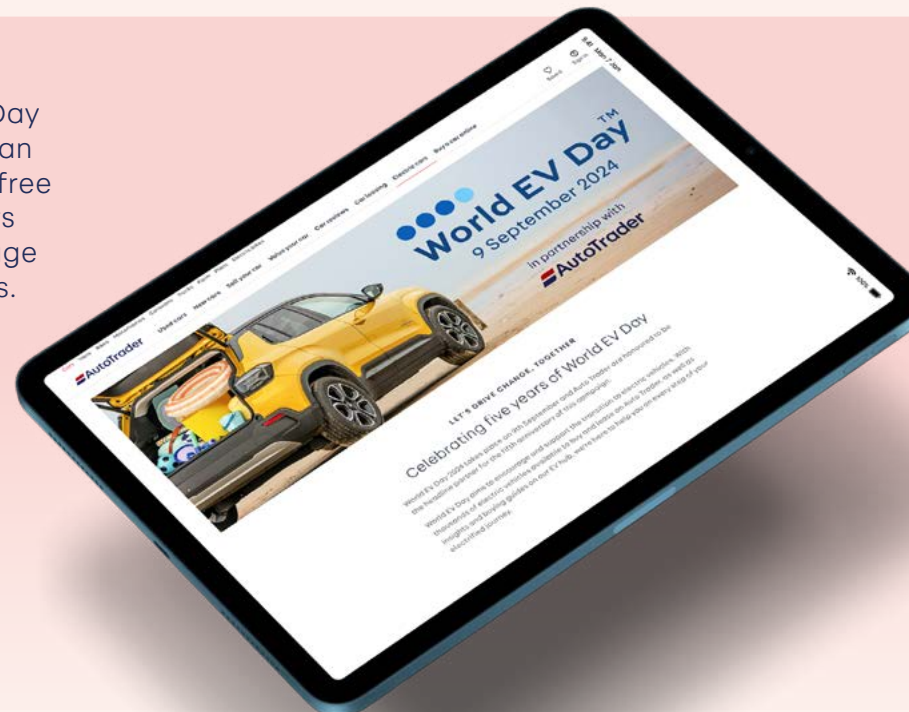
Sustainability

The automotive industry is under enormous pressure to reduce its carbon emissions and whilst many of our industry partners have clear and bold plans to reduce emissions, many are still very early on in their sustainability journeys and require support to help them develop a carbon reduction plan. Through our partnership with the Carbon Literacy Trust, we have created and funded the Automotive Carbon Literacy Toolkit which has gone from strength to strength. We have now also launched a Digital & Tech Toolkit with a new set of sector partners.

In the automotive space, 311 organisations have now completed the training, which our customers view as an important step in their sustainability journey, as well as a key employee engagement initiative. Once an individual in a business has been accredited as 'carbon literate', the business is then provided with training content and trainer manuals that enable them to run their own one-day Carbon Literacy training. Over 5,000 automotive professionals have now achieved carbon literacy through the toolkit to help sustainability efforts (2024: over 1,000).

In addition to the training, we continue our Building a Sustainable Automotive Industry event series which aims to inspire action and motivate businesses to be more sustainable by gathering industry partners and sustainability experts together. This includes an online knowledge hub and LinkedIn community where industry peers can share questions, challenges and successes. We also award sustainability categories at our Retailer and Manufacturer Awards to encourage and champion those working on sustainability in their businesses.

We are headline sponsors of World EV Day and to mark the occasion this year we ran a number of workstreams, from gifting free products to retailers and manufacturers to boost their electric stock, to homepage takeovers to raise consumer awareness. We also launched our new 'Find a car' tool which helps consumers to decide which electric vehicle is right for them.



Action: Our engagement strategy continued



CASE STUDY

Government relations

ENGAGEMENT WITH GOVERNMENT

We have been regularly engaging with various Government departments to share our data and insights to help guide policy for several years. The number of Government departments receiving these insights has expanded, showing the value and impact of our work. Additionally, we have been invited to present oral and written evidence at the House of Lords Environment and Climate Change Committee Electric Vehicles inquiry, with our research playing a key part in the summary document of the inquiry.

We are members of the Society of Motor Manufacturers and Traders ('SMMT'), British Vehicle Remarking and Leasing Association ('BVRLA') and partner with ChargeUK, all industry bodies representing different aspects of the automotive sector. These memberships are valuable as they provide additional routes to influence key stakeholders and share our data and insight.

We also host and sponsor Parliamentary events including roundtables and receptions with Ministers, sharing key insights and data tracking the electric transition to inform their policy making. This is a key component of our public affairs work as well as individual meetings with Ministers and Department officials.

This data also forms the basis of our award winning 'Road to 2030' Reports, which are extremely valuable to not only the Government, but also to media and the industries involved in the electric vehicle transition.

[VIEW MORE ONLINE](#)


"It's brilliant to see the great work the industry is doing in showcasing all the benefits of the transition."

Lilian Greenwood
Future of Roads Minister

Additionally, the Ministers are now using The Facts in their speeches as they make up a key part of their briefing documents from civil servants.

Our data and expert commentary is featured throughout the House of Lords Environment and Climate Change Committee **EV strategy: rapid recharge needed.**

[VIEW MORE ONLINE](#)


Action: Our engagement strategy continued

ENGAGEMENT WITH COMMUNITIES AND SOCIETY

We aim to be a guiding hand through the EV transition and to help consumers understand how they can make more environmentally friendly choices. Through our consumer EV hub, we provide buying guides, informative content and explainers for those curious about electric cars. The consumer marketing team is focused on increasing traffic to this hub through various paid marketing activities. Our electric car review content from both the editorial and YouTube teams also plays a vital role in educating and engaging drivers about EVs. Our EV monthly giveaway has been running for three years now, garnering over 15 million entries since the beginning of the campaign. The EV giveaway is an incredibly successful campaign which increases awareness of electric vehicles. The Facts myth busting material will also be promoted across all channels to raise awareness of the key information consumers need.

A significant development in our mission to support environmentally-friendly choices was the launch of new electric bikes on our platform. The electric bike community welcomed this as a sign of market maturity, excited by Auto Trader's influence. On-site interest in e-bikes has surged, with successful Black Friday promotions and editorial content. We have also run multiple campaigns with influencers to grow the reach and engagement of electric bikes on Auto Trader; these partnerships allow us to reach younger and more diverse audiences due to the hand-picked nature of the influencers we work with.

Our No Driver Left Behind report uncovered that women were keen to learn more about electric vehicles in the content they already consume and so we have targeted the lifestyle media – educating them about the need for electric vehicle content and engaging them with the new technology in a way that will resonate with their readers. Following multiple relationship building activities, we are seeing strong results with repeated coverage in key lifestyle titles.

We have partnered with Community Computers, who work to address digital exclusion in Greater Manchester, to donate used devices to their service users. By repurposing salvageable technology instead of selling it back to suppliers, these devices can have a second life and help the digitally excluded, aligning with our community values and net zero strategy.

The partnership also means that technical waste is not going to landfills.

We have also partnered with the Manchester Green Spaces Fund to join regional efforts of nature recovery projects driven by local people right across Greater Manchester. We've given £96,000 to the Green Spaces Fund (FY24) to expand an ongoing partnership with the Greater Manchester Environmental Fund. These projects include a community garden, a pond on a community allotment, native tree and hedge planting and a new wildlife corridor.

£96,000

donated to the
Green Spaces Fund



In 2023 we joined The Castlefield Viaduct Club, supporting the National Trust renovation work of the previously unused railway track, which is just a short walk from our Manchester campus. The aim is for the viaduct to become a 'garden in the sky' and a freely accessible green space. Through funding provided by the National Trust's relationship with Auto Trader, the garden was expanded to include a pond, planters for trees, a mural and more growing space.

Accountability

Accountability

Governance, metrics and targets: enabling delivery through robust governance and reporting.

OUR ROADMAP TO NET ZERO

Net zero refers to the balance between the amount of greenhouse gas produced and the amount removed from the atmosphere. We have established near-term (2030) and long-term (2040) emissions reduction targets in line with the SBTi Net Zero Standard.

Our greenhouse gas emissions and carbon intensity ratios are disclosed on page 49 and these form part of our key metrics.

We have committed to reach net zero greenhouse gas emissions across our value chain by 2040, committing to:

- Reduce absolute Scope 1 and 2 GHG emissions by 50% before 2030 from a 2023 base year.
- Reduce absolute Scope 3 GHG emissions by 46.2% over the same timeframe.
- Reduce absolute Scope 1, 2 and 3 GHG emissions by 90% by 2040 from a 2023 base year.

Our Net Zero roadmap visualises our emissions reduction from our 2023 base year until 2040. This roadmap does not yet account for business growth or incorporate the impact of actions and initiatives that we will use to achieve our target. Although we have started to quantify these, further work is required to fully model these into our roadmap. We intend to overlay these into our roadmap in the future, to further embed them into our business and financial planning, and to issue an updated roadmap in the next iteration of our transition plan.

To meet the SBTi's definition of net zero, we need to reduce our emissions by at least 90%. It is therefore essential that we fully understand the source of our emissions and undertake targeted actions. Our SBTi approved targets have been updated to include the impacts of acquiring the Autorama business in 2022.

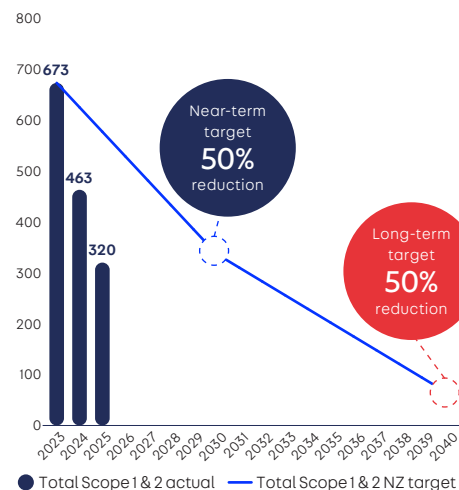
The make-up of our carbon emissions is heavily weighted towards Scope 3, and within that purchased vehicles, use of sold goods and other purchased goods and services are the biggest contributors.

To monitor progress against our environmental strategy, we have key metrics and targets. We also disclose our Scope 1, 2 and 3 GHG emissions.

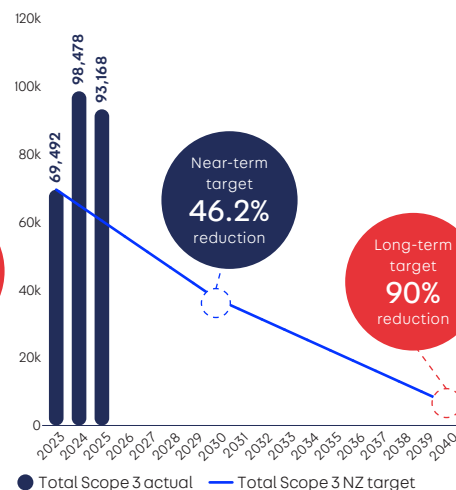
The Group is required to report its energy use and measure and report its direct and indirect greenhouse gas ('GHG') emissions by the Companies (Directors' Report) and Limited Liability Partnerships (Energy and Carbon Report) Regulations 2018. The GHG reporting period is aligned to the financial reporting year.

Reported energy and GHG emissions data is compliant with SECR requirements and has been calculated in accordance with the GHG Protocol and SECR guidelines.

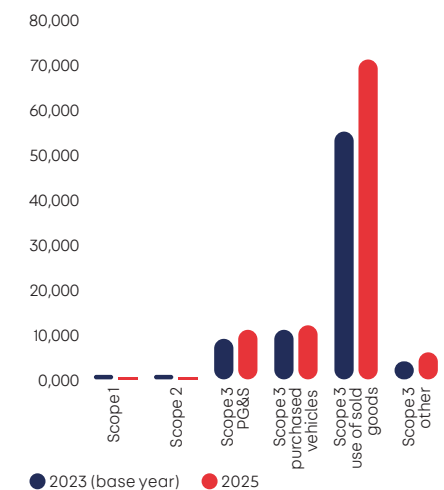
Scope 1 & 2 reduction target (tonnes of CO₂)



Scope 3 reduction target (tonnes of CO₂)



Our emissions (tonnes of CO₂)





Accountability continued

METHODOLOGY

The methodology used to calculate emissions is based on the financial control consolidation approach, as defined in the Greenhouse Gas Protocol, A Corporate Accounting and Reporting Standard (Revised Edition).

Emission factors used are from the UK Government's GHG Conversion Factors for Company Reporting, and selected other emissions factor datasets as applicable, for the year reported. For Scope 3 Category 1, an Environmentally Extended Input Output database methodology was used to calculate the GHG footprint across total spend in the year.

INDEPENDENT VERIFICATION OF OUR GHG EMISSIONS

EcoAct has independently assessed and verified Auto Trader's GHG emissions following verification standard ISO 14064-3:2019. Based on the data and information provided by Auto Trader and the processes and procedures followed, nothing has come to EcoAct's attention to indicate that the GHG emissions totals for all years reported are not fairly stated and free from material error.

ENERGY AND EMISSIONS REPORTING

Our total CO ₂ emissions ¹	2025		2024	
	UK	Global	UK	Global
Scope 1	116	116	258	258
Scope 2 (location based)	204	204	205	205
Total (Scopes 1 and 2)	320	320	463	463
KwH ('000s)	1,277	1,277	1,448	1,448
Purchased goods and services		19,457		22,949
Capital goods		1,375		2,262
Fuel and energy-related activities		91		74
Upstream transportation and distribution		–		–
Waste generated in operations		100		107
Business travel		933		1,041
Employee commuting (inc. working from home)		725		982
Upstream leased assets		–		–
Use of sold products		69,950		70,643
End of life treatment of sold products		172		383
Investments		45		37
Scope 3 (total)		92,848		98,478
Total (Scopes 1, 2 and 3)		93,168		98,941
Group revenue		£601.1m		£570.9m
Tonnes of CO ₂ equivalent per FTE ²		73.5		80.2
Tonnes of CO ₂ equivalent per £million turnover		155.0		173.3
Scope 2 (market based)		0.1		10
% renewable		99%		95%
Auto Trader total emissions		9,903		14,169
Autorama total emissions		83,265		84,772

1. Scopes 1, 2 & 3 are reported in tonnes of CO₂ equivalent.

2. Based on average number of employees in the Group throughout the year 2025: 1,267 (2024: 1,233).

Accountability continued

Our approach to climate governance

We have integrated climate governance into our existing governance processes and sought to embed responsibility for the risks associated with climate change throughout our business, adopting a climate change focused mindset. There is a clear commitment from the Board to deliver on our environmental commitments and ensure relevant accountability across the business. Our environmental strategy was initiated to ensure a joined up approach across the business considering the risks and opportunities climate issues pose and how we are responding to them.

We submitted our annual CDP questionnaire and received a B rating in December 2023; we are awaiting our 2024 score. The rating is on a scale from A (best possible score) to D-. Our current rating indicates that Auto Trader has knowledge of impacts on, and of, climate issues and that we are taking coordinated action on climate issues.

TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES ('TCFD') COMPLIANCE STATEMENT

The Group has prepared its TCFD disclosures in line with guidance from the 2021 updates to the TCFD Final Report and Annex, including the supplementary guidance for all sectors. At the time of publication, in accordance with the UK's Financial Conduct Authority ('FCA') Listing Rule 9.8.6R(8), the Group has made climate related financial disclosures consistent with the TCFD recommendations and recommended disclosures set out on page 94. The table included in the Corporate Responsibility Committee report (page 92) summarises where the relevant disclosures are addressed. We continue to develop our net zero strategy and to identify the risks and opportunities to our business as a result of climate change and the potential financial impact. The climate related financial disclosures made by the Group comply with the requirements of the Companies Act 2006 as amended by the Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2022.

HOW WE GOVERN THIS AREA



1. BOARD RESPONSIBILITY

The Corporate Responsibility Committee is responsible for holding the Executive Directors to account with respect to climate risks and opportunities and their impacts on both the business and the wider environment. Our environmental strategy is a standing agenda item for all Committee meetings.

2. EXECUTIVE RESPONSIBILITY

The responsibility for assessing and managing climate related risks and opportunities sits at both Executive and Board level. Executive responsibility for our impact on climate change is held by all our Executive Directors, who have responsibility for overseeing our environmental strategy. Responsibility for the consideration of climate related risks and opportunities on the financial performance of the Group and compliance with environmental reporting sits with our CFO, Jamie Warner.

3. RISK FORUM

Our Risk Forum undertakes a review of climate related risks with our Auto Trader Leadership Team ('ALT').

Environmental risks are also reviewed at least twice a year as part of the overall risk review process.

4. REMUNERATION COMMITTEE

The Committee introduced ESG-related targets into the Performance Share Plan ('PSP') for the first time in 2021. The PSP includes a specific performance target linked to a reduction in our GHG emissions.

5. THIRD-PARTY ASSURANCE

Our GHG emissions have been independently assured by EcoAct using ISO 14064-3 for all scopes of our carbon footprint.

6. ENVIRONMENTAL WORKING GROUPS

Our environmental strategy not only focuses on our own environmental impact, but also aims to support our customers, consumers and the industries in which we operate and, as a result, various parts of the business play a part in delivering our ambitions. Different parts of the business are brought together through our Environmental Strategy working group, which is sponsored by members of our ALT. Key activities and milestones are set for each financial year and these are shared with the Corporate Responsibility Committee. The Environmental Strategy working group is responsible for our commitment to net zero, which is in line with our SBTi targets. This group also identifies ways in which we can support the tech and automotive industries, alongside helping consumers make more environmentally friendly vehicle choices.

7. EMPLOYEE GUILDS & NETWORKS

Our employees play a fundamental role in the success of our environmental strategy. Our Sustainability Network comprises passionate individuals from across the business who are focused on making life at Auto Trader more sustainable. They do this through increasing employee awareness and driving impactful changes for both individuals and our business, supporting our overall goal of reducing our carbon emissions.

TARGETS AND METRICS

Our operations

SBTi approved near and long-term targets (see page 34).

Supporting the automotive and technology industries

Number of EVs advertised on Auto Trader
33,603
average as at March 2025 (2024: 22,536)

Share of EVs advertised on Auto Trader
5.6%
during FY25 (FY24: 4.5%)

Number of EVs delivered by Autorama
950
during FY25 (FY24: 876)

Number of videos produced covering EVs
41
during FY25 (FY24: 56)

Supporting consumers

Number of EV advert views on Auto Trader
150 million
during FY25 (FY24: 105 million)

Share of EV advert views on Auto Trader
5.0%
during FY25 (FY24: 3.7%)

Number of EV giveaway entries
15.5 million
since campaign started (FY24: 10.8 million)

Number of video views covering EVs
6.5 million
during FY25 (FY24: 7.9 million)

Disclaimer

DISCLAIMER

This Climate Transition Plan ('CTP') is for information purposes only and does not constitute, nor is to be construed as, an offer to sell or the recommendation, solicitation, inducement or offer to buy, subscribe for or sell shares in Auto Trader. It should not be treated as giving investment, legal, accounting, regulatory, taxation or other advice.

The plan has been prepared taking account of a number of relevant guidance frameworks and standards, as set out in the TCFD Compliance Statement. Given that regulatory obligations on Auto Trader continue to develop, and new guidance related to such obligations is published on an ongoing basis, it is possible that the CTP may not reflect all guidance applicable in relevant markets, whether published before or after the date of this.

CTP. CAUTIONARY NOTE REGARDING FORWARD LOOKING STATEMENTS

Certain statements in this CTP constitute forward looking statements (including beliefs or opinions). 'Forward looking statements' are sometimes identified by the use of forward looking terminology, including the terms 'believes', 'estimates', 'aims', 'anticipates', 'expects', 'intends', 'plans', 'predicts', 'may', 'will', 'could', 'shall', 'risk', 'targets', 'forecasts', 'should', 'guidance', 'continues', 'assumes' or 'positioned' or, in each case, their negative or other variations or comparable terminology. Any statement in this CTP that is not a statement of historical fact is a forward-looking statement including, without limitation, statements regarding climate-related targets, goals and commitments. Any forward looking statements made in this CTP speak only as of the date they are made and are based upon the knowledge and information available to Auto Trader on the date of this CTP. Such forward looking statements are subject to known and unknown risks and uncertainties, because they relate to events that may or may not occur in the future, that may cause actual results to differ materially from those expressed or implied by such forward looking statements. These risks and uncertainties include, among other factors, changing economic, financial, business or other market conditions. These and other factors

could adversely affect the outcome and financial effects of the plans and events described in this CTP. As a result, you are cautioned not to place reliance on such forward looking statements, which are not guarantees of future performance and the actual results of operations, financial condition and liquidity, and the development of the industry in which the Group operates may differ materially from those made in or suggested by the forward looking statements set out in this CTP. Except as is required by applicable laws and regulatory obligations, no undertaking is given to update the forward looking statements contained in this CTP, whether as a result of new information, future events or otherwise. Nothing in this CTP should be construed as a profit forecast.

The CTP has been prepared using information from third parties and publicly available sources, that Auto Trader may have not independently verified, and Auto Trader provides no assurance as to the reliability or completeness of this information.

We can give no assurance that we will meet the goals, targets or intentions outlined in the plan. Further, statistics and metrics may be estimates and subject to assumptions or developing standards (including Auto Trader's internal standards and policies).



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[Auto Trader Insight](#)