

A photograph of a rooftop terrace with a city skyline in the background. In the foreground, a young man in a red jacket and jeans is sitting on a wooden bench, smiling and reading a book. Behind him, a woman in a pink hijab and red jacket is sitting on the same bench, looking at her phone. The sky is blue with some clouds. A teal and orange graphic element is in the top right corner.

grainger plc

Net zero carbon pathway

Delivering our commitment
to achieve net zero carbon

November 2025

Version 2: Updated to include science-based target

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1. Introduction

Net zero carbon pathway

Grainger is supportive of the UK Government's target to achieve net zero carbon by 2050 and is committed to reducing the carbon emissions associated with Grainger's business operations in alignment with a 1.5 degree climate warming scenario and achieving net zero by 2050. This document sets out our proposed pathway to reduce our emissions and how we will measure progress towards achieving our commitment.

We have carbon reduction commitments relating to our operational emissions and the carbon embodied within our direct development projects.

Our previous emissions reduction targets have been replaced with our science-based target which has been validated by the Science Based Targets initiative: To reduce absolute scope 1 and 2 GHG emissions 42% by FY2030 from a FY2023 base year¹ and to reduce scope 3 GHG emissions from capital goods and downstream leased assets 51.6% per m2 residential gross internal area within the same timeframe.

This reduction pathway sets out the high level actions we will take to decarbonise our Scope 1, 2 and 3 emissions.

¹ The target boundary includes land-related emissions and removals from bioenergy.

2. Our business strategy

Net zero carbon pathway

Grainger's net zero carbon commitment is aligned to our business strategy and informs strategic decisions taken by the business.

Grainger's strategy is focused on transitioning to a build to rent (BTR) focused business which derives recurring net rental income from a core portfolio of high quality, well-located assets.

We regularly review our portfolio against criteria including ESG risks and opportunities, which informs our asset hierarchy and asset retention and refurbishment plans. These criteria include energy efficiency ratings, type of heating systems and opportunities for refurbishment.

Our business strategy includes divesting out of the majority of our regulated tenancy portfolio which means we anticipate selling out of the majority of these properties by 2030, and therefore our net zero carbon pathway actions are focused on our BTR portfolio.

Grainger's commitment to providing high quality rental homes means we invest in our assets to maintain and also to enhance their quality, and this includes implementing initiatives which prioritise our carbon reduction. To maintain affordability for our customers, we ensure that refurbishments of our assets optimise capital and operational costs, whilst delivering an improved customer experience, helping our customers reduce their energy costs and environmental impacts.

Our strategy is to invest in and develop high quality, energy efficient homes. Grainger intends to own and manage these homes for the long-term. Some of our developments are delivered through a forward-funded model which currently limits the influence we have over the design of the buildings and their construction. For all developments, we apply Grainger's design specification which incorporates low carbon materials and appliances, and will work closely with our development partners and supply chain to deliver schemes which are Net Zero Ready in operation, and which address embodied carbon reduction.

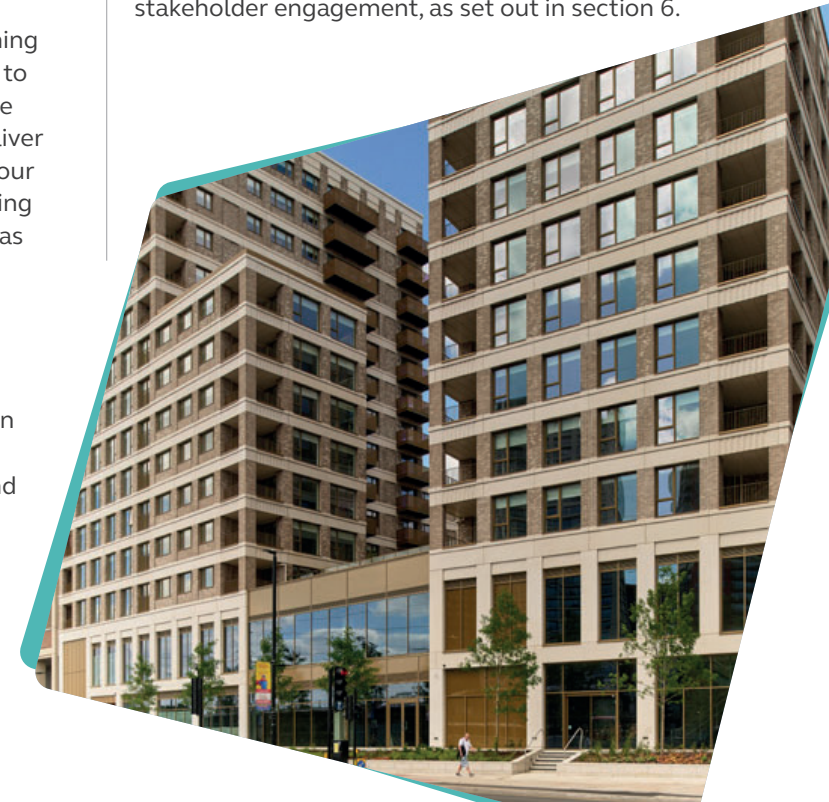
Grainger's strategic growth plans are transitioning our portfolio from older, less efficient buildings to new or refurbished high quality assets which are more energy efficient. Our strategy will also deliver our commitment to eliminate fossil fuels from our properties by transitioning away from gas heating systems to lower carbon heating systems such as heat pumps.

Grainger's strategic property investment, development and operational decisions take into account our net zero carbon commitment.

This includes considering the energy and carbon implications of investments in acquisitions and developments, asset management decisions and asset recycling.

We believe Grainger's net zero carbon strategy will assist us in managing the climate related risks and opportunities arising from the UK's transition to a net zero carbon economy. Grainger's most material transition risks and opportunities are reported in our Taskforce on Climate-related Financial Disclosures (TCFD) reporting which is included in our Annual Report and Accounts.

Grainger's transition to net zero is reliant on external factors outside of our control. The key assumptions that sit behind this pathway are set out in section 3.3. We seek to influence these factors through stakeholder engagement, as set out in section 6.



3. Net zero carbon in operation

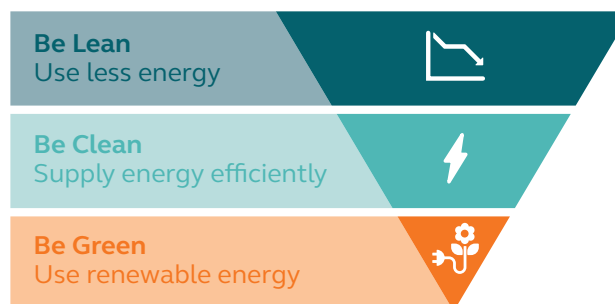
Net zero carbon pathway

Our key actions – Reducing carbon in operation

- Developing net zero carbon asset plans.
- Improving the energy efficiency of our properties through communal and unit refurbishments.
- Transitioning away from fossil fuel heating systems.
- Generating and purchasing renewable energy to supply our properties.

3.1 Our approach

Our approach to reducing our emissions to net zero carbon aligns to the UK Green Building Council's framework definition for net zero carbon buildings. We follow the energy hierarchy set out below, and prioritise reducing energy demand, with offsetting only to be used as a last resort for residual emissions which we are unable to eliminate.



Our science-based target means we will reduce Grainger's purchased energy consumption and associated greenhouse gas (GHG) emissions in line with a 1.5 degree climate warming scenario and deliver science aligned reductions in our key Scope 3 emissions categories.

3.2 Scope

This pathway covers Scopes 1 and 2 and all material Scope 3 emissions sources. For the operation of our buildings, these include emissions from our customers' use of energy in their homes (downstream leased assets) and emissions from purchased goods and services. Emissions from development activities are covered in Section 4.

As the UK's largest listed residential landlord with properties where our customers purchase their own energy, we have introduced green lease clauses in our tenancy agreements and developed a strategy to measure our BTR customers' energy use and associated Scope 3 emissions. We are committed to reducing our Scope 3 emissions and are working with our customers through our Living a Greener Life customer engagement programme, which seeks to educate and encourage customer behaviour.

Our customer emissions reduction strategy is focused on BTR customers rather than regulated tenancy customers as we plan to own those buildings for the long-term and have more opportunity to influence customer emissions on these properties where we have greater control and more frequent customer engagement.



3. Net zero carbon in operation *continued*

Net zero carbon pathway

Our commitment and this pathway applies to all properties owned by Grainger and its subsidiaries. We include properties owned in Joint Ventures as Grainger has operational control for these assets. The actions set out in this pathway will be focused on our BTR portfolio due to our planned divestment from the non-core regulated tenancy portfolio. Regulated tenancy properties are typically sold to owners that plan to renovate and improve the property and typically this supports carbon reduction.

3.3 Assumptions

The following key assumptions apply to the net zero carbon commitments outlined below:

Grid decarbonisation - The electricity grid is fully decarbonised by 2035, which aligns to the UK Government's Clean Power 2030 Action Plan.

Heating technologies - Heat pumps will be the preferred heating technology for homes and will achieve cost parity for capital and running costs with gas boilers by 2030.

Heat networks - Government will introduce requirements for heat networks to decarbonise and the decarbonisation of heat networks supplying Grainger schemes will be completed by 2040.

3.4 Our pathway to net zero carbon

Use less energy

Communal refurbishments

As part of our long-term asset management activities, we undertake refurbishments to the common parts of our buildings which are designed to improve their energy efficiency and the overall energy efficiency of the building. A typical refurbishment includes a lighting upgrade with installation of lighting controls, and we undertake fabric upgrades such as window replacements and roof works where opportunities exist to future proof our assets. These refurbishments typically reduce the energy consumed in the building's common parts by between 30% and 50%. Communal refurbishments will be implemented on all remaining assets identified for long-term hold and are incorporated into our asset management plans accordingly.

Improve 100% of PRS properties to EPC C or above

We also undertake a programme of rolling refurbishments to homes which will reduce the Scope 3 carbon emissions from the energy used by our customers to operate their homes. These are designed to support our EPC Plan C Strategy to ensure all BTR homes are rated EPC C or above. Refurbishments seek to invest in facilitating future low carbon installations where these are cost effective. The specific improvements are determined based on the opportunities identified at each home and building but can include upgrades to heating systems, lighting replacements and insulation.

We also install energy efficient appliances and provide guidance to our customers through Living a Greener Life on how to use their appliances in the most efficient manner to optimise their energy consumption.

Supplying energy efficiently

Replace gas communal heating systems at end of life cycle

We are committed to transitioning away from natural gas to electric or low carbon heating systems. For existing assets which have communal gas heating under Grainger's control, we intend to remove these gas systems or replace them with electric or low carbon alternatives. To optimise impacts on running costs for customers and leaseholders and to reduce embodied carbon, we plan to replace these systems as they reach the end of their useful life and as new technology becomes available. For district heating systems outside of Grainger's control we will seek to influence the heat network operator to decarbonise the heat network.

We have updated our specification for new developments and assess new potential acquisitions against our sustainability criteria including our preference to avoid fossil fuel heating. For direct developments, all developments are designed to use low carbon heating via heat pumps. Where we can influence the construction of the forward funded developments, these are designed to use low carbon heating with heat pumps preferred.

3. Net zero carbon in operation *continued*

Net zero carbon pathway

Replace individual gas boilers at end of life cycle

A key action to reduce our Scope 3 emissions from customers' use of energy in their homes is upgrading gas boilers in our homes to electric or low carbon alternatives and we are committed to undertaking this transition in alignment with the UK Government's Net Zero Strategy. We plan to implement this as individual gas boilers reach the end of their useful life from 2030 onwards and in a manner that ensures we do not materially increase running costs for our customers. This commitment is reliant on the achievement of the UK Government's ambition to achieve cost parity between owning and running a gas boiler and a heat pump by 2030.

When undertaking refurbishments of individual homes, we consider the capital and operational costs and the carbon impacts of potential heating system upgrades to ensure we are undertaking this transition in a manner that ensures we continue to provide mid-market homes that are affordable for our customers to run.

Aim for all heat networks to be decarbonised by 2040

In some cases planning requirements dictate that our new developments are required to connect to a district heat network which is outside of our operational control. Where this is the case, we will engage with the heat network operator to confirm the plant life cycle and their decarbonisation plan and where we can, we will seek to influence the heat network operator to decarbonise the heat

network. Delivery of this commitment is dependent on the Government introducing decarbonisation requirements for heat networks which are anticipated to apply shortly. If these are not implemented then it will be difficult to reduce carbon from heat networks as they are not within Grainger's control.

Renewable energy

Grainger purchases 100% renewable electricity

Grainger purchases renewable electricity for all eligible landlord supplies, which typically supply the common parts of Grainger's buildings. We are committed to purchasing renewable electricity for 100% of our supplies. We have made good progress towards this goal and now purchase renewable electricity for over 95% of our supplies. Upon completion or acquisition of a BTR building, the landlord supplies are transferred across to the central contract in Grainger's name, however there is typically a lag time in transferring new homes which affects a small proportion of supplies. We are working closely with contractors and our energy broker to ensure supplies are transferred as quickly as possible. The diversity of Grainger's portfolio of residential assets makes it challenging to purchase renewable energy on a contract which guarantees the creation of additional renewable supply. As we consolidate our portfolio into a more focused group of BTR assets, we continue to explore options for a Power Purchase Agreement to ensure the renewable energy we are consuming is from additional low carbon supply.

We are also responsible for purchasing energy for void homes and have introduced a void agreement with a single energy supplier which includes a renewable electricity contract.

Although our customers purchase their own energy and we cannot dictate which tariff they choose, we encourage them to use a renewable tariff. Placing our homes on a renewable tariff when they are void means they will be on a renewable tariff when a new customer moves in. We hope this will encourage new customers to keep their electricity on a renewable tariff. In alignment with the target for the national grid to be fully decarbonised by 2035, we have assumed that all residents will be on a renewable tariff by 2035 at the latest.

Grainger generates renewable energy

Where possible we use available roof space for solar photovoltaics (PV). On some assets the renewable energy generated is fed into the grid and on some assets it is used to supply the building's common parts, which is our preferred strategy.

Offsetting

We intend to only use offsetting as a last resort where we are unable to eliminate emissions in the future. We will ensure we only use accredited schemes that meet the best practice offsetting principles recommended by the UK Green Building Council.

4. Net zero carbon in development

Net zero carbon pathway

Our key actions – Reducing carbon in development

- Measuring whole life carbon on development and refurbishment projects.
- Reducing upfront embodied carbon through lean design.
- Partnering with our contractors to reduce embodied carbon through materials choices and construction methods.
- Minimising whole life carbon through our fit-out specification.

4.1 Our Approach

We recognise that the development, refurbishment, maintenance and management of our buildings throughout their lifecycle generates embodied carbon emissions and we are taking steps to measure and reduce the embodied carbon from our buildings at all stages of the lifecycle. As upfront embodied carbon generates the most significant proportion of carbon, our embodied carbon reduction roadmap is focused on this area.

However on forward funded schemes we usually have greater control over embodied carbon in the latter design stages, particularly the fit-out of the building. As Grainger will own and manage the finished building for the long-term, it is important to us to optimise the carbon impacts of our properties throughout their operation and ensure they are easy to maintain and refurbish during their lifecycle. We are therefore also taking steps to reduce embodied carbon during the operational stage through our fit out specifications.

We have developed an embodied carbon roadmap to measure embodied carbon on our direct development projects and establish a baseline for typical Grainger developments from which we can measure performance.

4.2 Scope

Our current primary focus for reducing embodied carbon is on direct development projects where we have most control over the building's design and construction and have the ability to innovate and learn first hand. Where we use a forward funded procurement model, our ability to control the embodied carbon of our buildings is limited at this time, as the building's design and the building contractors are often confirmed before Grainger commits to the development. However, we ensure the design of each project is reviewed against our specification and ESG criteria prior to proceeding and work closely with our development partners and contractors to adapt the design and development of each scheme to align with Grainger's brief and net zero carbon objectives as closely as possible within the constraints of viability.

As we increase our investment in stabilised acquisitions and improving the energy efficiency of our existing properties, we are also seeking opportunities to minimise embodied carbon from refurbishment projects



4. Net zero carbon in development *continued*

4.3 Our pathway to net zero carbon

Seek to achieve reductions in upfront embodied carbon emissions in direct development projects

Grainger's embodied carbon roadmap is applied to all our direct development projects.

We will seek to achieve reductions during the design stage through lean design. We are also looking to reduce embodied carbon through the construction stage in collaboration with our main contractor partners through a review of alternative materials, suppliers, working methods and logistics.

To identify lean design reduction opportunities, each Grainger direct development scheme will have an engineering appraisal undertaken to identify efficiencies and specific opportunities to reduce embodied carbon within the proposed building design.

To identify reduction opportunities through alternative materials, supplier working methods and logistics the main contractor will be asked to present a cost benefit analysis of alternatives that could be used in the building's construction to reduce carbon.

Grainger has developed requirements which are included in main contractor tender/contract documents that will oblige our contractor partners to work with Grainger to endeavour to achieve our embodied carbon reductions.

Implement measurement and reduction plans for in-use embodied carbon

Grainger already considers the lifespan and carbon content of products used in the fit-out of our buildings and takes steps to optimise replacement and refurbishment. We will continue to review our development and refurbishment specifications to identify further opportunities to reduce carbon through the procurement of materials, the maintenance, repair and replacement of items through the buildings lifecycle and through logistics including deliveries and plant used on site. We will seek to apply lessons from this approach to our refurbishment projects where relevant.

Reducing our embodied carbon emissions from forward funded projects

Although our prime focus for embodied carbon is currently on the direct development projects where Grainger has more control over the design, construction and fit-out of the buildings, we will apply lessons learned from our approach to our forward funded development schemes. In time we expect embodied carbon regulation and industry innovation to mean similar embodied carbon standards are achievable on our forward funded projects and direct development projects.

To inform this, we will commission embodied carbon assessments for our forward funded schemes and will engage with our developers on these schemes to identify any opportunities to reduce embodied carbon through alternative materials, supplier, working methods and logistics.



4. Net zero carbon in development *continued*

Net zero carbon pathway

We have amended our template Forward Fund Development Agreement and Schedule Amendments to require our developer and contractor partners to share the information required for Grainger to carry out a Whole Life Carbon assessment to facilitate this.

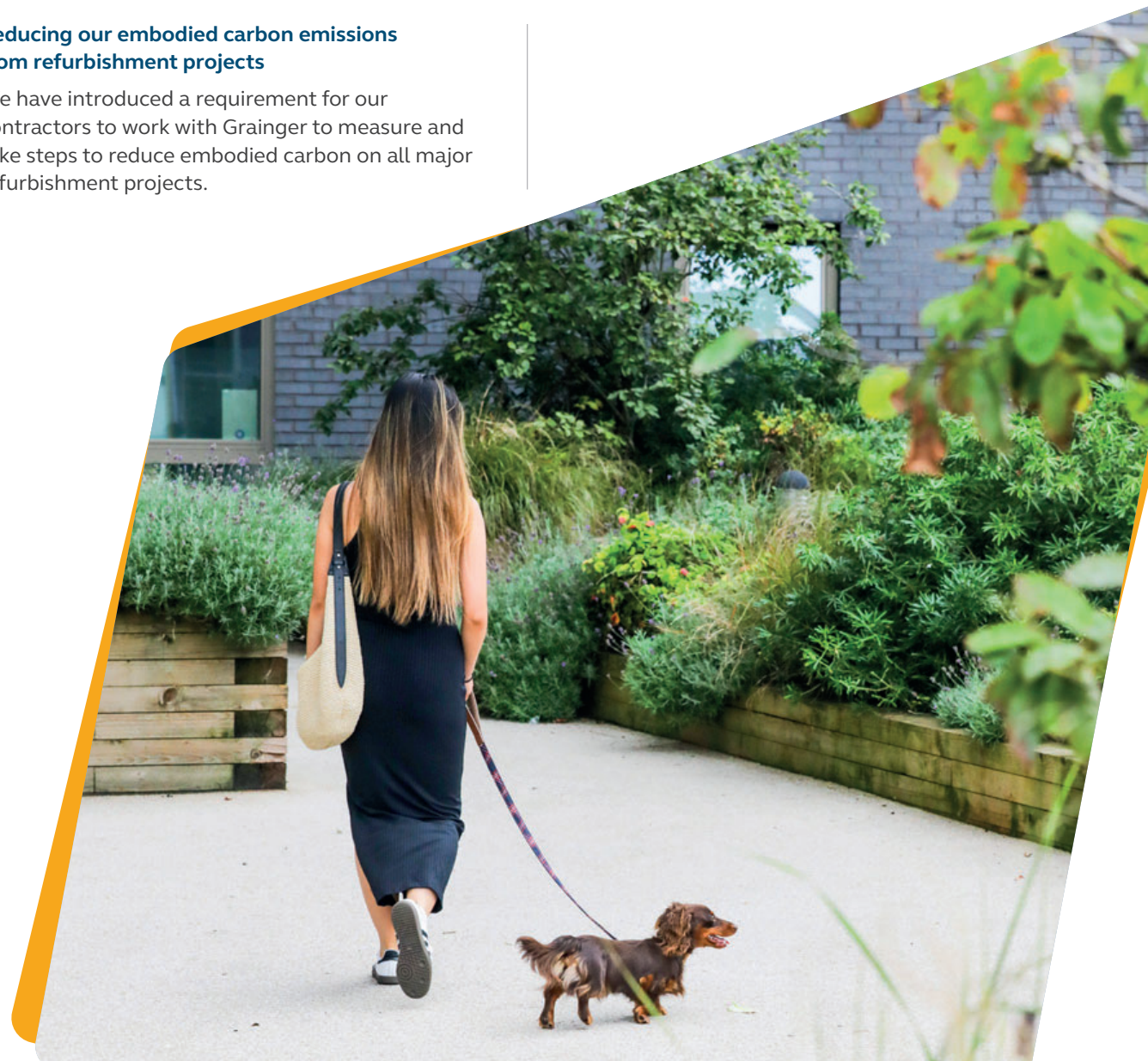
Although the bulk of embodied carbon comes from the substructure and superstructure which are determined through the design process, there are additional opportunities to reduce embodied carbon through the specification of Mechanical, Electrical and Plumbing (MEP) and through the procurement of finishes such as flooring and furniture. We regularly review Grainger's specification to identify any further opportunities to reduce embodied carbon through these elements.

Reducing our embodied carbon emissions from strategic land projects

Grainger has two long-term strategic land projects where we are developing the infrastructure for the creation of new communities. We will work with the housebuilders who purchase the land to identify opportunities to reduce embodied carbon through alternative materials, supplier and working methods. We are facilitating the development of net zero carbon ready homes on these sites by seeking to invest in upgraded electricity grid infrastructure.

Reducing our embodied carbon emissions from refurbishment projects

We have introduced a requirement for our contractors to work with Grainger to measure and take steps to reduce embodied carbon on all major refurbishment projects.



5. Corporate emissions

Net zero carbon pathway

Grainger has two key sources of corporate emissions which are within the scope of our science-based target – our offices and our fleet.

5.1 Offices

Scope

Grainger has five head office locations. Two are owned by Grainger and we are wholly responsible for purchasing the energy consumed in these offices. Two are located in multi-let buildings and Grainger is responsible for the energy purchased and consumed within our demise only. However, at these buildings we are not responsible for gas and electricity obtained by the landlord and recharged to Grainger through the service charge and this is reported in our Scope 3 emissions. We engage with our landlords and other occupiers at these sites to support and encourage energy and carbon reduction initiatives at the building level.

Our Aldershot office is an interim office on a development site which is leased from the Ministry of Defence, our development partner, and is a heritage asset with limited opportunities to improve energy efficiency. This office is outside the scope of our Net Zero Carbon Pathway. Emissions associated with Grainger colleagues working from home are also not included within the scope of this Pathway.

Our pathway to net zero carbon

Office occupation strategy

Our net zero carbon commitment is a consideration in our office occupation decision making. Energy efficiency and net zero carbon performance is part of the brief for our office relocations and refurbishments. Where we own our offices, opportunities to improve energy efficiency are considered in the design of refurbishments and where we own or lease our offices, it is a key consideration in the fit-out.

Since we adopted our net zero carbon commitment, we have moved to new offices in Birmingham, London and Salford, and refurbished our Newcastle head office, which has delivered energy and carbon reductions.

Review of energy efficiency

We review office energy consumption on an ongoing basis and analyse trends to identify energy efficiency opportunities. We undertake regular energy audits to identify improvements. Actions implemented following the audits include installation of timing controls on appliances and reviews of temperature set points.

We have also implemented improvements to technology to reduce our power consumption and emissions. These include reducing the energy used in our office IT communications rooms and upgrading IT hardware with more energy efficient solutions. We also operate a hybrid working policy which reduces office occupancy and associated energy consumption.

Our net zero carbon internal communications campaigns include regular reminders on how Grainger colleagues play their part in reducing our corporate emissions and delivering our net zero pathway.

Procurement of renewable energy

We ensure that all Grainger purchased energy for our offices is on our central renewable electricity and green gas contracts.



5. Corporate emissions *continued*

Net zero carbon pathway

5.2 Fleet

Scope

Grainger has a very small number of vehicles which are leased by the Company for employees that are deemed as essential car users for business travel.

Actions towards net zero carbon:

Review of fleet efficiency

A review of fleet users has been undertaken which has led to a reduction in the size of Grainger's vehicle fleet. The fleet scheme is expected to come to an end in 2028.

Electrification

Grainger's fleet will only include electric or hybrid vehicles that offer lower emissions.

Travel Policy

Carbon reduction is incorporated into Grainger's Travel Policy. Grainger offers a range of options to encourage colleagues to travel by low carbon transport options, including:

- Travel platform facilitating rail bookings
- Car club membership with providers which offer electric vehicles
- Cycle to work scheme

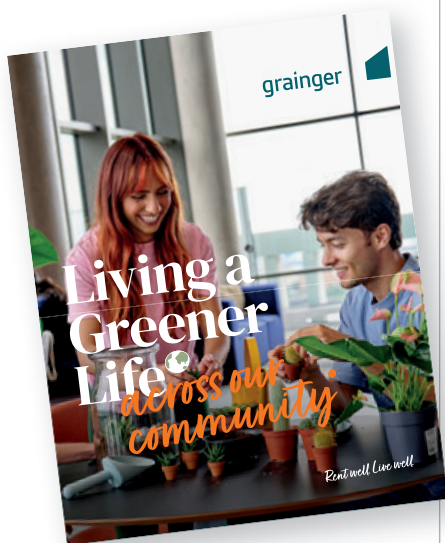
Internal colleague engagement campaigns promote low carbon travel including features on car sharing, electric vehicles and cycling to work.



6. Engagement

Our key actions – Reducing carbon through engagement

- Internal engagement to encourage energy efficient colleague behaviours.
- Training and upskilling our colleagues in net zero carbon.
- Supplier engagement programme with our key supplier partner.
- Living a Greener Life customer engagement campaign.
- Collaborating with our industry to develop and deliver best practice.
- Engaging with Government on net zero policies.



6.1 Supplier Engagement Programme

We recognise that our supply chain has a key role to play in achieving our net zero carbon pathway.

Within our existing procurement processes we include consideration for environmental topics, including emissions and approaches to carbon reduction. We ensure that these elements form part of supplier selection and any subsequent supplier management.

Throughout 2025/2026 we are working to segment our supply chain to highlight those suppliers of most risk to Grainger, and who are significant contributors of carbon. From this we will focus on the top 10 suppliers and obtain actual emissions data from them. From 2026/2027 onwards, we will look to obtain this information from all tier 1 and 2 suppliers, through an automated system. Our new and improved supplier code of conduct captures our expectations from our suppliers including how our development suppliers can support us in achieving embodied carbon reductions.

6.2 Customer Engagement Programme

We believe that providing an energy efficient home that delivers high levels of comfort for our customers and reduces the costs of running their homes is a core part of delivering high quality homes and great customer service. Our customers purchase their own energy and emissions generated from our customers' use of their homes fall outside of Grainger's operational control.

However, we know to achieve net zero carbon we need our customers to be part of the journey and we are committed to helping and encouraging our customers to reduce their energy use and associated emissions.

Our Living a Greener Life campaign is our customer and colleague engagement campaign focused on five greener living themes including energy saving, waste reduction and recycling, greener building operation, buying local and engagement and awareness. We host a range of energy saving campaigns and events in our BTR buildings and share tips with our customers to help them understand how they can most effectively reduce their energy consumption at home.

Data protection regulations limit our ability to measure the actual energy use and associated emissions generated by our customers, and to quantify the reductions we are making. However, we have rolled out green lease clauses in our new tenancy agreements and developed a customer emissions strategy to improve measurement of customer emissions and this is delivering continual improvements in data coverage.

6. Engagement *continued*

Net zero carbon pathway

6.3 Engagement with Government and Industry

The successful implementation of our net zero carbon strategy also depends on external factors, including the political and regulatory environment in which we operate. To support the development of policy frameworks aligned to our net zero carbon ambitions we engage with national and local Government on net zero carbon related topics both directly and indirectly through our membership of industry bodies.

Our direct engagement includes regular meetings with civil servants, ministers, and MPs at which we discuss the benefits of BTR including energy efficient properties. We engage through responding to consultations on key net zero carbon related policies. We also indirectly engage with local Government in areas where we are developing new buildings, for example through the planning process. We are active members of the British Property Federation, European Public Real Estate Association and UK Association for Rental Living. We participate in a number of key industry committees including the British Property Federation Residential Board, Policy Committee and Sustainability Committee. We are signatories to the Net Zero Carbon Buildings Commitment and supported the development of the Net Zero Whole Life Carbon Roadmap. We are part of the BTR Alliance of industry peers that is establishing a consumer code for Build to Rent which includes the sustainability related standards we as a sector intend to meet and are a signatory of the Greater Manchester Good Landlord Charter.



7. Governance

Net zero carbon pathway

7.1 Board Oversight

This document has been reviewed and approved by Grainger's Responsible Business Committee and the Board. An update on progress towards our net zero carbon pathway is provided at biannual meetings of the Responsible Business Committee. The Board also considers Grainger's net zero carbon commitments in decision-making such as considering new acquisitions.

7.2 Executive Committee Roles and Responsibilities

Grainger's Executive Committee holds day-to-day responsibility for the implementation of the net zero carbon pathway. Members of the Executive Committee with responsibility for Land, Development, Asset Management and Operations are delegated responsibility for delivering the key actions set out in our pathway to net zero carbon.

Executive remuneration is aligned to net zero carbon related objectives and progress is monitored by Grainger's Executive Committee.

7.3 Internal Engagement

We recognise that achieving our net zero carbon pathway requires the involvement of everyone in our business. Our internal colleague engagement campaign - our journey to zero - includes regular communications about our net zero carbon pathway progress on our intranet and in our weekly

newsletters. Regular training sessions are delivered which include broad overview sessions and bespoke training for specific teams such as embodied carbon for our Development team. Regular net zero carbon updates are provided on company-wide calls.

To achieve net zero carbon we need to harness the technical knowledge and expertise of colleagues in different teams across our business. Our net zero carbon transition is being considered in long-term resourcing plans and we are taking steps to upskill net zero carbon champions in key business areas through learning and development.

We also incentivise our colleagues to deliver strong performance in this area through net zero carbon related objectives linked to remuneration and our internal awards and recognition programmes.

7.4 Reporting on progress

We are committed to reporting transparently on our progress towards our net zero carbon commitment and will publish regular updates.

An overview of the company's emissions performance is included in the Streamlined Energy and Carbon Report within the Annual Report and Accounts, with a portfolio breakdown included in the EPRA aligned Sustainability Report available to download on our website: <https://corporate.graingerplc.co.uk/responsibility>

We also provide detailed disclosure on our approach to climate related governance, strategy, risk management and opportunities in our TCFD reports and public responses to the CDP Climate Change Program.

For more information on Grainger's sustainability disclosure or this pathway document, please contact Grainger's Head of Sustainability:

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