

# CO<sub>2</sub> Performance Ladder report 2024/2025 KPMG N.V.

**November 2025** 



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## 1 Introduction

KPMG N.V. is one of the Netherlands' leading providers of assurance and advisory services. We are part of the global KPMG network, operating in 143 countries and territories worldwide. We work with well-known public, private and not-for-profit companies in industries ranging from financial services and consumer retail to energy, infrastructure and healthcare. Through our work, we aim to ensure public trust in companies, institutions and financial markets.

<u>Assurance</u> and <u>Advisory</u> are our two primary businesses, supported by Central Services. KPMG N.V. has <u>twelve offices</u> across the Netherlands, and is headquartered in Amstelveen.

Climate change is one of the defining challenges of our time, bringing both risks and opportunities for business and society. As part of our commitment to sustainable progress, we take responsibility for reducing our environmental impact and supporting the transition to a low-carbon economy.

Our ambition is to become a net zero business by 2050, an action needed for organizations to pivot towards a 1.5 degree world. We aim to reduce our emissions by 50 percent by 2030, in line with our near-term Science-Based Target, and are in the process of validating our long-term 2050 Science-Based Target.

Our commitment to reducing greenhouse gas (GHG) emissions is outlined in the global KPMG Impact Plan, which forms the basis of our Dutch Impact Plan. We consider this plan our strategy for climate change mitigation, as described below. While we recognize the complexity of this journey, particularly in addressing Scope 3 emissions, we remain focused on quantifying and mitigating the impact of our operations and services. Our approach includes aligning with KPMG International's science-based targets (SBTs), integrating climate considerations into our decision-making, and helping our clients navigate their own climate-related challenges.

# 1.1 CO<sub>2</sub> Performance Ladder

The purpose of the CO<sub>2</sub> Performance Ladder is to realize a substantial in-company decrease of CO<sub>2</sub>-emissions, encouraging measures within operational management, projects and the supply chain. It is a tool designed to assist organizations in lowering their carbon emissions and serves as both a CO<sub>2</sub> management system and a procurement resource.

The  $CO_2$  Performance Ladder is a  $CO_2$  management system that consists of five levels. An organization that is certified on a certain level adheres to all the requirements of the  $CO_2$  Performance Ladder as set for that particular level. These requirements are based on four angles<sup>1</sup>:

<sup>&</sup>lt;sup>1</sup> What is the ladder (CO<sub>2</sub>-prestatieladder.nl)



- A. **Insight**: To determine different streams of energy and the carbon footprint of the organization.
- B. **Reduction**: To develop ambitious goals for the reduction of CO<sub>2</sub> emissions.
- C. **Transparency**: To structurally communicate about organization policies and progress of CO<sub>2</sub> reduction.
- D. **Participation**: To take part of business sector initiatives with regards to the reduction of carbon emissions.

This document provides insights into the current position of KPMG N.V. on the CO<sub>2</sub> Performance Ladder. It has been set up in line with the four angles of the Ladder as described above and accordingly covers the requirements specified in <a href="Handbook 3.1">Handbook 3.1</a> of SKAO. In January 2025 KPMG N.V. has been certified with the CO<sub>2</sub> Performance Ladder certificate on level 3; this document is an update and an extension to the report published in January 2025 and covers also the requirements of level 5 of Handbook 3.1.



# 1.2 Operating and reporting limits

## 1.2.1 Reporting period

This CO<sub>2</sub> Performance Ladder report covers our fiscal year 2025, which runs from October 1, 2024 to September 30, 2025.

## 1.2.2 Governance and responsible actors

Establishing an efficient governance structure at all management levels is crucial for ensuring proper focus and effective decision-making. The responsibility for climate action – including implementing and monitoring climate-related policies, targets, and action plans at KPMG N.V. – is anchored with our COO, on behalf of the Board of Management.

To ensure broad ownership and effective execution, the COO has delegated specific responsibilities and tasks to members of the Group Leadership Team. Relevant operational department leads such as Facilities and Procurement leads act as policymakers, guiding our environmental policy within departments to ensure progress and improvements. These department leads, along with their teams, are also responsible for implementing the action plans.

These teams collaborate to collect data, evaluate progress, and communicate internally and externally. Table 1 provides further overview of the responsible departments and of the tasks and responsibilities within the CO<sub>2</sub> Performance Ladder.



	Minimal Frequency	Corporate Responsibility	Operational team	Communications	(External) advisor	Leadership
A. Insight						
DMA/Identification environmental aspects	Yearly	x	X		x	
Collection of emissions data	Quarterly	x	X		х	
Approval emission inventory	Quarterly	x			x	x
Drawing up emission inventory	Quarterly		х			
Evaluation of energy assessment	Half-yearly		х			
B. Reduction						
Reduction policy and roadmap	Yearly					х
Target setting and prioritization	Yearly	X			x	
Approval targets and prioritization	Yearly					x
Research on opportunities and impact of measures	Continuous	х	х		х	
Determination of measures	Yearly	x	х			x
Achieving targets	Continuous	x	х			
Monitoring, reporting, and evaluating progress	Quarterly	х	х		х	х
C. Transparency/Communication						
Update communications plan	Half-yearly			x		
Update SKAO webpage	Half-Yearly	x				
Update KPMG website	Half-yearly			х		
Update internal communications	Half-yearly			х		
Update project list regarding CO₂ award advantages	Half-yearly	x				
D. Participation						
Determination of initiatives	Continuous	X	X		X	
Update initiatives list	Half-yearly	х				
Participation in initiatives	Continuous	х	x		x	
Other						
Update CO <sub>2</sub> report	Half-yearly	Х			х	
Check CO <sub>2</sub> Performance Ladder requirements	Yearly	x				
Conduct Internal Audit	Yearly		x		x	
Report to management	Quarterly	Х				

Table 1: Governance and responsible actors



# 1.3 Organizational boundaries

To determine the organizational boundaries, the rules from the CO<sub>2</sub> Performance Ladder Handbook 3.1 and the Greenhouse Gas Protocol ("GHG Protocol") are followed.

The choice was made for the GHG Protocol with the 'Operational Control Approach' and the control of KPMG N.V. was examined. The subsidiaries in which the group has a majority or any financial and operational stake are 100% included within the organizational boundaries.

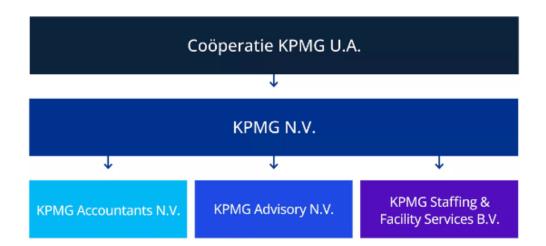
Coöperatie KPMG U.A. is a holding organization without operational activities and resources. KPMG's partners are participants in the cooperative. The cooperative does not own other companies. The cooperative has the operating company KPMG N.V.. which carries out all operational activities and is contractually bound for buildings, fleet and activities. All activities, including participation in initiatives and communication internally and externally, are organized by KPMG N.V. The cooperative is therefore excluded from the boundary and the entire operational organization is included in the boundary. Because the entire operational organization is included in the boundary, the AC analysis is no longer necessary<sup>2</sup>. Within its borders, KPMG N.V. (Chamber of Commerce 34153857) is an independent Dutch entity that is a member of KPMG International Limited, an English limited liability company, of which all national KPMG organizations are members. KPMG International Limited is an international form of cooperation through membership, KPMG International Limited does not control KPMG N.V. or Coöperatie KPMG UA. KPMG Accountants N.V. (Chamber of Commerce 33263683), KPMG Advisory N.V. (Chamber of Commerce 33263682) and KPMG Staffing & Facility Services B.V. (Chamber of Commerce 34153861) are 100% subsidiaries of KPMG N.V.

As a result, KPMG N.V. consists of separate business units in which the Assurance and Advisory services to clients and the support services respectively are housed. The entire organization is included in the CO<sub>2</sub> Performance Ladder; there are no components that are left out of the CO<sub>2</sub> Performance Ladder.

The visual below shows the organizations that fall within the limits according to the CO<sub>2</sub> Performance Ladder Handbook 3.1.

<sup>&</sup>lt;sup>2</sup> Handbook CO<sub>2</sub> Performance Ladder







# 2 Insight

# 2.1 Size of the company

The  $CO_2$  Performance Ladder distinguishes between the size of organizations based on  $CO_2$  emissions: small, medium and large organizations. If the total  $CO_2$  emissions are more than 2,500 tons per year, the organization is classified as a medium organization. With a total  $CO_2$  emission for Scope 1 and 2 in 2024/2025 of 1.333  $tCO_2$  (market based), KPMG is classified as a medium-sized organization according to the  $CO_2$  Performance Ladder.

# 2.2 Emissions inventory

To determine the organizational boundaries, the rules from the CO<sub>2</sub> Performance Ladder Handbook 3.1 and the Greenhouse Gas Protocol ("GHG Protocol") are followed. Based on these definitions, the greenhouse gas emissions resulting from the activities carried out by the organization within the boundaries specified in this section have been categorized as direct (Scope 1), indirect energy (Scope 2), and other indirect (Scope 3) greenhouse gas emissions.

During this reporting period and within this report, the organization's Scope 1, Scope 2, and Scope 3 greenhouse gas emission sources have been reported. Following the identification of emission sources, and detailed information regarding the selection of appropriate emission factors, the calculation process based on the operational data is provided in chapter 2 of this report.

#### Scope 1 - Direct greenhouse gas emissions

This includes the amount of greenhouse gases directly emitted from greenhouse gas sources owned or controlled by the organization.

- Stationary combustion: Natural gas consumption for heating purposes in the office buildings that are owned or rented.
- Mobile combustion: Company fleet fuel consumption of gasoline and diesel used in leased company cars as reported by the fleet supplier

#### Scope 2 - Indirect greenhouse gas emissions

This covers indirect greenhouse gas emissions generated during the production of electricity, heat or steam consumed by the organization through external supply. Electricity consumption in office areas and for charging EV fleet that are controlled by KPMG N.V and its entities are included in the scope of this report.

Scope 2 emissions are reported following both methodologies aligned with GHG Protocol: location-based and market-based.

### Scope 3 - Indirect greenhouse gas emissions

This covers the emissions resulting from the organization's activities and arising from sources that are not owned or controlled by the organization. These entail in total 15



Indirect CO<sub>2</sub> emission categories, such as business travel, purchased goods and services, fuel and energy-related activities, waste generated, commuting, etc.

In addition to the previously (January 2025) reported Scope 3 categories (business travel and fuel- and energy-related activities), a full Scope 3 screening was conducted. Based on this assessment, the following two emission streams were identified as the most significant in terms of volume and strategic relevance:

- 1. Purchased Goods and Services (Category 1)
- 2. Business Travel (Category 6)

These categories were selected from the top six Scope 3 categories based on their contribution to total emissions and their potential for influence and reduction. Accordingly, these two categories were chosen for detailed chain analysis, the results of which are documented in separate supporting documents.

The greenhouse gas emission sources included in the scope of reporting which are considered to be continuous, considering the activities evaluated within the scope of this inventory, are listed below:

Scope of emission	Type of activity	Consumption / Activity Data description
Scope 1	Stationary combustion	Natural gas used for heating in KPMG N.V. office buildings (owned or leased)
Scope 1	Mobile combustion	Fuel (gasoline, diesel) used by leased company vehicles as reported by the fleet supplier
Scope 2	Purchased electricity	Electricity purchased and consumed in office buildings under KPMG N.V. operational control
Scope 2	EV charging	Electricity used for charging the KPMG N.V. electric vehicle fleet
Scope 2	Guarantee of Origins accounted for green energy	Guarantees of Origin for renewable electricity sourced from the Dutch market
Scope 3 Category 1	Procurement of goods and services	Total annual spend on goods and services, broken down by supplier category if possible; may include estimated emissions based on supplier data or spend-based emission factors.
Scope 3 Category 3	Upstream energy production	Estimated energy use in the supply chain, calculated using supplier data or standard emission factors.
Scope 3 Category 5	Waste disposal and treatment	Total waste generated (kg or tons), by waste type and disposal method.
Scope 3 Category 6	Employee business travel	Total kilometers traveled by mode (air, rail, car, etc.), or total emissions calculated from travel booking data.
Scope 3 Category 7	Employee commuting	Estimated kilometers commuted by employees, by mode of transport, or survey-based estimates.

Table 2: Scopes of emissions inventory



Within the scope of this report, emissions from these sources that are used by KPMG N.V. and its entities listed in section 1.3 are specified as follows:

Gross Scope 1, 2, and 3 emissions (tCO₂e)	Retrospective			Target	
Emission category	Baseline year 2018/2019	2023/2024	2024/2025	%(2024/2025)/ (2019/2020)	2029/2030
Scope 1 GHG emissions					-98.5%
Gross Scope 1 GHG emissions (tCO <sub>2</sub> e)	8,532	2,110	1,333	-84%	
Scope 2 GHG emissions					
Gross location-based Scope 2 GHG emissions (tCO₂e)	1,888	3,071	3,827	103%	N/A
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> e)	2,828	2,884	0	-100%	-100%
Scope 3 GHG emissions					
Total gross indirect (Scope 3) GHG emissions (tCO <sub>2</sub> e)	22,990	29,431	28,885	26%	-26% <sup>1</sup>
Purchased goods and services - End-user IT devices - Other commodities and services	14,318 161 14,157	21,345 1,325 20,020	22,069 824 21,245	54% 412% 50%	N/A
Fuel and energy-related activities (not included in Scopes 1 and 2)	2,237	1,688	1,220	-48%	
Waste generated in operations	4	3	3	-25%	
Business travel	6,228	6,191	4,941 <sup>2</sup>	-32%	N/A
Employee commuting	203	204	1,340 <sup>3</sup>	560%	N/A
Total GHG emissions (location-based) (tCO₂e)	33,410	34,613	34,045	2%	N/A
Total GHG emissions (market-based) (tCO₂e)	34,351	34,426	30,218	-12%	-50%

<sup>&</sup>lt;sup>1</sup>The disclosed Scope 3 emission reduction target is provisional and aligned with our commitment to achieving a 50% gross emissions reduction.

<sup>2</sup>As of January 2025, new DENSZ (formerly Defra) emission factors are taken into account, resulting in lower emissions per km of air travel

<sup>3</sup>Due to data quality improvements, we are now better able to distinguish business travel emissions from employee commuting emissions. This resulted in a shift of emissions previously allocated to business travel to employee commuting. The disclosed emissions for business travel are different from those presented in the Integrated Report. This is because the figure above includes full lifecycle emissions of fuels from air travel (WW), whereas in our integrated report we report exhaust pipe emissions of air travel (TfW).

Table 3: Emissions inventory

This table presents emissions data calculated in accordance with the CO<sub>2</sub> Performance Ladder Handbook 3.1 This has slight differences with the requirements for emissions accounting according to the GHG Protocol as followed in our Integrated Report. Most notably, the Performance Ladder requires full lifecycle (WtW) emissions accounting in Scope 3, resulting in higher air travel emissions in the business travel category, as we add the upstream emissions of fuel consumption in airplanes (WtT) to the inventory.



# 2.3 Progress and challenges across scopes

KPMG N.V. continues to make strong progress in reducing Scope 1 and 2 greenhouse gas emissions, achieving our targets for these categories through measures such as electrification of the fleet, energy efficiency improvements, and sourcing 100% renewable electricity. However, we face significant challenges in meeting our Scope 3 reduction targets. Despite the implementation of various sustainability measures, we did not achieve our Scope 3 targets this year. This is partly due to our strategic focus on improving data quality and developing a comprehensive dashboard to enable better monitoring and steering of emissions. These efforts are essential for building a robust foundation for future reductions, but they have temporarily diverted resources from direct reduction measures.

Based on our value chain analysis, we have developed a recovery plan—also integrated in our Environmental Management System—that includes measures extending beyond the standard levers of our decarbonization journey: energy efficiency, renewable energy, sustainable mobility, and sustainable procurement. These new interventions are designed to have a broader impact across our value chain and support the achievement of our long-term climate ambitions.

# Scope 1 and 2 performance

By the end of 2024/2025, compared to our 2018/2019 baseline, we had reduced Scope 1 emissions by approximately 84% (from 8,532 tCO<sub>2</sub>e to 1,333 tCO<sub>2</sub>e)<sup>3</sup> and Scope 2 market-based emissions by 100% (from 2,828 tCO<sub>2</sub>e to 0 tCO<sub>2</sub>e). This amounts to a 88% decrease in Scope 1 and 2 emissions compared to our 2018/2019 baseline.

These reductions are primarily driven by actions aligned with our decarbonization levers, such as phasing out fossil-fueled lease cars (87% of our fleet is electric, compared to 9% in 2018/2019), adopting smart building technologies during our the remodeling of our Amstelveen office, and sourcing 100% renewable energy (for our offices and vehicle fleet) through Dutch-certified EACs. However, increased EV charging needs mean we have seen a rise in electricity consumption by 22 % compared to 2023/2024 contributing to an increase in Scope 2 location-based emissions. While we have achieved 100% renewable sourcing, we continue to implement additional measures to reduce overall energy consumption and are targeting a location-based reduction of three to five percent in the coming three years.

# Scope 3 performance

While we are on track to reduce Scope 1 and 2 emissions, achieving our Scope 3 reduction target remains a challenge. Our goal is a 26% reduction by 2029/2030 compared to 2018/2019—equivalent to just over 2% per year. At present, we are not on track to meet this target.

<sup>&</sup>lt;sup>3</sup> Emissions represent direct Scope 1 emissions and exclude WtT emissions, as these are reported in Scope 3, category 3



Business growth in recent years has resulted in higher Scope 3 emissions, primarily attributable to higher spending on purchased goods and services.

For business travel, emissions are mainly driven by air travel. Air travel emissions are approximately 25% lower in 2024/2025 than they were in the base year of 2018/2019. This decrease is largely due to the update of the emission factors set by the UK Department for Energy Security and Net Zero (DENSZ). Additionally, there has been a shift toward lower service level, such as economy and premium economy, which can reduce emissions by 30-60% per trip.

Improved data quality and tracking have resulted in a reallocation of non-air emissions from business travel to commuting. This reclassification reflects more accurate reporting and contributes to the overall decline in business travel emissions.

# 2.4 Calculation methodology

The following method is used to calculate greenhouse gas emissions resulting from the activities KPMG N.V. for baseline year between October 1, 2018 to September 30, 2019 and for most recent year between October 1, 2024 to September 30, 2025.

The formula used in greenhouse gas emission calculations is as follows: Greenhouse Gas Emission Amount ( $tCO_2e$ ) = Activity Data x Emission Factor ( $ton\ CO_2e$ /unit of the activity data)

Emission factors are provided as carbon dioxide (CO<sub>2</sub>) equivalent (CO<sub>2</sub>e).

#### 2.4.1 Assumptions and data limitations

## Scope 1, 2 and Scope 3:

Office building-related consumption figures, including natural gas (in m³) and electricity (in kWh), are now based on actual measured data for the reporting period. This replaces the previous approach, which relied on extrapolating from prior year figures. All energy usage calculations in this report reflect the most recent, directly recorded consumption values.

#### Scope 2:

For electricity consumption in our offices and energy for charging our EV fleet, we applied the fuel-based calculation method.

## Scope 3

For Scope 3 emissions, we applied various calculation methods depending on the availability of data and the nature of the purchases. The majority of the emissions are calculated using the spend-based approach, where the total annual expenditure per goods/service category was multiplied by relevant emission factors, following the GHG Protocol guidelines. For IT equipment, we used supplier-specific Product Carbon Footprint (PCF) data, which allowed for a more accurate calculation based on the actual carbon footprint reported by the manufacturer for each product.



Fuel-related activities were assessed using a fuel-based method, while waste emissions were calculated using data through the average data method.

Emissions from business travel and employee commuting were calculated using the average data method. For air travel, we used data from the Schiphol Travel International dashboard. Non-air business travel and employee commuting was assessed through survey results and using our internal mobility system, which records kilometers traveled across various transport modes. This is a significant data quality improvement compared to previous years. The main reason for this improvement is the implementation of the mandatory disclosure to the Netherlands Enterprise Agency (RVO) for business travel and employee commuting (Werkgebonden Personenmobiliteit). Going forward, we will be using the information disclosed to the RVO as a basis of reporting our GHG emissions for (non-air) business travel and employee commuting.

#### 2.4.2 Emissions factors

Scope of emissions	Emission factors	Calculation method	EF cycle accounted
Scope 1	CO <sub>2</sub> -emissiefactoren	Fuel-based	Use-phase (Tank-to- Wheel)
Scope 2 Location-based	CO₂-emissiefactoren	Fuel-based	Use-phase (Tank-to- Wheel)
Scope 3 Category 1 -Purchased Goods and Services -IT Devices	CO₂-emissiefactoren Supplier-specific PCF data (manufacturer-reported values)	Spend-based Supplier- specific, Product- LCA	Upstream
Category 3 - Fuel related activities	CO₂-emissiefactoren	Fuel-based	Upstream (Well-to-Tank)
Category 5 - waste	DEFRA Waste Emission Factor Database 2023	Supplier-specific	Upstream (Well-to-Tank)
Category 6 – Business travel - Air travel - other	Air: DESNZ, formerly known as DEFRA Other: CO <sub>2</sub> -emissiefactoren	Average data Fuel-based	Full life cycle
Category 7 – Employee commuting	CO <sub>2</sub> -emissiefactoren	Average data	Full life cycle

Table 4: Emission factors used in the calculations. For CO<sub>2</sub>-emissiefactoren: CO<sub>2</sub>-emissiefactoren.nl; for DESNZ: Gov.UK



## CO<sub>2</sub> compensation

There is no compensation for CO<sub>2</sub> emissions.

### **Baseline** year

KPMG International adheres to the Science Based Targets initiative (SBTi), and as its member firms are following suit, we have adopted 2018/2019 as our baseline year for emissions reduction targets as well, as it represents the last full financial year before the COVID-19 pandemic, ensuring our targets reflect a realistic and stable starting point.

These baseline values as reported in table 3 are recalculated in 2024/2025; KPMG N.V. did a full screening of its value chain related activities and therefore added all relevant categories including Category 3 – Fuel and energy-related activities in its reporting boundary, also improving the calculation methodology for emissions as disclosed in the Sustainability statement in KPMG N.V. Integrated report 2024/2025.

#### **Assurance**

To provide assurance regarding the accuracy and completeness of the environmental data presented in the Sustainability statement, we engaged PwC to perform a limited assurance review. This review covered the environmental data for both the baseline comparative year and the most recent reporting year. Limited assurance provides moderate levels of confidence that no material modifications are necessary for the environmental data to be fairly stated, based on the procedures performed by PwC.



# 3 Reduction

Our decarbonization journey encompasses both our direct operations and the broader areas we can influence through collaboration. We are committed to driving impact across our entire value chain. A critical first step is assessing the level of control we have - not only over our own emissions, but also in our wider contribution to the global ambition of a lower-carbon society.

To address the challenges identified in our value chain, we have developed a recovery plan, integrated within our Environmental Management System. This plan includes interventions that go beyond the standard decarbonization levers of energy efficiency, renewable energy, sustainable mobility, and sustainable procurement. These additional measures are specifically designed to create broader impact throughout our value chain and to accelerate progress toward our long-term climate objectives.

In the following sections, we will first outline our reduction targets, and then detail the measures we are implementing to achieve them.

# 3.1 CO2 reduction targets

In reducing our carbon footprint, KPMG N.V. adheres to KPMG International's commitment to achieving a near-term Science Based Target (SBT) to decarbonize our business by 50% across scopes 1, 2, and 3 by 2029/2030, compared to our 2018/2019 baseline. This target aligns with the aim of limiting global warming to 1.5°C in line with the Paris Agreement and was validated by the Science Based Targets initiative (SBTi) in 2021. We adopted this target and specified it per scope using our 2018/2019 baseline data.

To achieve our overarching 50% emissions reduction target, we are following a comprehensive decarbonization strategy that addresses emissions across all relevant scopes. This includes sub-targets for Scope 1 (direct emissions from owned or controlled sources), Scope 2 (indirect emissions from the purchase of electricity) and Scope 3 (all other indirect emissions that occur in a company's value chain). Please refer to the breakdown of near-term sub targets in Section 3.2.



# 3.2 Near-term (2030): GHG emission reduction targets per category

Focus Decarbonization levers	Emission category	
	Overall GHG emission reduction	50%*
	Scope 1 emission reduction target	98.5%
	Mobile combustion (leased cars, gasoline and diesel)	100%
Energy efficiency,	Scope 2 market-based emission reduction target	100%
renewable energy	Electricity consumed in office buildings	100%
	Electricity consumed to charge EVs	100%
Decarbonization of our supply chain and	Scope 3 emission reduction target	~26%
embedding circularity	Purchased Goods & Services	~26%
Travel	Business travel (air, rail, and road)	~26%

Targets are monitored based on GHG Protocol aligned reported emissions. All targets are gross targets, since we do not engage in any GHG removal activities or carbon credit trading, nor do we contribute to avoided emissions.

Table 5: Emission reduction targets per scope and category

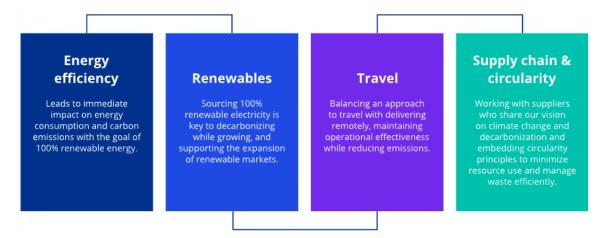
# 3.3 The focus areas of our transition strategy

To reduce our carbon footprint effectively and meet our 2029/2030 reduction target of 50%, we have identified four major sources of GHG emission reduction. These "decarbonization levers" are:

- improving our energy efficiency;
- transitioning to renewables;
- · reducing emissions from our travel;
- decarbonizing our supply chain and embedding circularity.



## The main levers in our journey to net zero



### 3.4 Measures

To drive our decarbonization journey we focus on the levers that can make the greatest impact.

## 3.4.1 Lever 1: Energy efficiency

Our environmental policy prioritizes energy efficiency in our buildings. During the ongoing remodeling of our Amstelveen headquarters, we are implementing smart building technologies, including occupancy sensors, to reduce energy consumption. These initiatives are aligned with our commitment to continuous improvement and are supported by the ESG Dashboard, which enhances our ability to track emissions and energy consumption in real time.

We have already achieved 100% market-based renewable electricity for Scope 2 emissions, which is a significant milestone in our sustainability journey. However, to further reduce our overall energy consumption and improve efficiency, we are deploying a series of measures across our operations. We expect that these will lead to an average energy reduction of approximately three to five percent per year over the coming three years, as new offices are designed and certified according to BREEAM and WELL standards.

Our approach to building efficiency focuses on creating smart environments that actively manage energy use facilitated by bGrid. We will implement motion-controlled LED lighting as part of a broader smart building concept, ensuring that lighting and climate control is only used when and where it is needed. In addition, heating and cooling systems will be optimized through intelligent HVAC controls and data-driven analytics, allowing us to adjust temperature settings dynamically based on occupancy and usage patterns. These technologies will be complemented by energy-efficient audiovisual and IT equipment to reduce energy demand from technology. At our Amstelveen Headquarters, we will introduce a smart lift system that uses intelligent



scheduling and energy recovery technology to minimize standby power and optimize elevator usage. Together, these measures form an integrated smart building strategy that combines automation, sensors, and real-time monitoring to achieve maximum efficiency.

### 3.4.2 Lever 2: Renewable energy

Our renewable energy actions focus primarily on electricity consumption in our buildings and by our EV fleet, including by purchasing Energy Attributes Certificates (EAC). As part of our broader decarbonization strategy, we also acquired Dutch-certified EACs in 2024/2025 to green the electricity used to charge our EV fleet. This complements our commitment to phasing out fossil-powered lease cars by 2029/2030. To support our renewable energy goals, we have tightened the requirements for office building owners during contract renewals and are now mandating the use of sustainably sourced energy and higher energy-label standards. The purchase of EACs in 2024/025 resulted in 100% renewable energy thus already meeting our 2029/2030 goal.

#### 3.4.3 Lever 3: Travel

After purchased goods and services, business travel – especially air travel – is our second-largest source of emissions, accounting for 15% of KPMG 's total footprint.

Our Impact Plan and Air Travel Policy include actions to reduce emissions from mobility and promote sustainable travel. These include mandatory rail or car travel for journeys under 700 km, rules on business class bookings, and the promotion of video conferencing as the default for meetings. In 2024/2025, we also launched an internal awareness campaign to communicate our emission targets and the impacts of different travel behaviors, encouraging more sustainable decision-making around business travel.

For business travel by car, our sustainable mobility approach includes phasing out fossil-powered lease cars. As of 2024/2025, only electric lease cars are offered, and we expect that in 2027/2028 our entire lease fleet will be electric.

Reducing air travel remains a challenge due to growing demand from clients for inperson meetings. To stimulate reductions in air travel emissions, KPMG uses an ICP mechanism. In 2024/2025, we began implementing ICP as a "shadow price," meaning that while emissions from flights are tracked and priced internally, the cost is not yet reflected in profit-and-loss statements. The application of the "polluter pays" principle is currently under review and has been approved to implement in FY26. When flying is necessary, we encourage our people to book economy class or premium economy over business class, which can reduce emissions by 30–60% per trip.



Furthermore, we aim to reduce the reliance on electric vehicle charging by encouraging employees to use, when possible, public transport. This shift will be supported by targeted communication and incentives. We also offer eco-driving training programs to improve driving behavior and reduce energy consumption from business travel.

#### **Collaboration in the Value Chain**

To strengthen our sustainability efforts, we have identified additional measures based on our Business Travel chain analysis that focus on collaboration with key partners such as travel management companies, airlines, accommodation providers, clients, and internal departments. Working closely with these stakeholders is essential for obtaining accurate emissions data and implementing effective reduction strategies.

One important measure is the coordination of travel planning with clients and project teams to reduce flight frequency and optimize itineraries, resulting in lower emissions and greater efficiency. We also aim to align our travel procurement with environmental goals through preferred supplier agreements that prioritize low-carbon options like Sustainable Aviation Fuel (SAF), and support policy enforcement features such as blocking short-haul flights.

To encourage more sustainable booking behavior, we are exploring tools that integrate carbon calculators and sustainability filters into travel systems, helping users make informed decisions. Additionally, improving data transparency through detailed emissions reporting from travel providers supports internal monitoring and policy refinement. These interventions reflect our commitment to reducing air travel emissions through shared responsibility and systemic change.

The full details of these measures and supporting data are documented in the chain analysis reports: Chain Analysis Business Travel – Air Travel.

## 3.4.4 Lever 4: Sustainable supply chain and circularity

We recognize that ongoing and proactive engagement with our suppliers is critical to achieving our decarbonization ambitions. Purchased goods and services represent a significant portion of our Scope 3 emissions and are a key focus in our emission-reduction plan.

In 2024/2025, we significantly advanced the integration of ESG considerations into our procurement strategy, anchored by the launch of the Sustainable Procurement Transformation Program. This introduced a revised procurement policy, an updated Supplier Code of Conduct, a targeted Supplier Engagement Strategy, and a newly developed repertoire of ESG-related contract clauses.

The updated Supplier Code of Conduct reflects KPMG's corporate purpose, values, and ESG vision. It sets out minimum requirements across all ESG topics and includes practical recommendations to support suppliers in progressing beyond compliance. These standards are embedded in all new requests for proposal and purchase



contracts. For suppliers with elevated ESG risk profiles, we apply additional requirements from the ESG clauses repertoire.

To ensure a differentiated and effective approach, we have developed a methodology to classify suppliers based on both business criticality and ESG impact. Each classification is linked to a tailored engagement strategy, enabling targeted interventions and meaningful supplier dialogue. Our Procurement teams have been trained on this framework, to ensure consistent implementation and foster ESG-focused supplier engagement.

This strategic integration of ESG into procurement is further reflected in operational decisions. For example, we set specific sustainability requirements for the remodeling of our Amstelveen office, including the use of circular materials and the reuse of existing elements such as carpeting, furniture, and interior walls.

Looking ahead, we aim to further streamline our supplier engagement processes, clarify ESG data requirements, and enhance our monitoring and collaboration mechanisms to drive continuous improvement.

#### **Collaboration in the Value Chain**

As part of our efforts to address the substantial Scope 3 emissions we conducted a dedicated chain analysis on purchased services, focused on emissions resulting from services procured from other KPMG member firms. These emissions represent a substantial portion of our Scope 3 footprint. To address these emissions we have identified targeted measures that focus on collaboration and data-driven improvement across the value chain. Key partners include KPMG International and other member firms, with whom we work to improve data quality, share best practices, and align on decarbonization strategies. Our approach starts with enhancing emissions data by moving from a spend-based to an activity-based method, allowing for more accurate tracking of emissions per billable hour. We actively engage our top-emitting member firms to better understand their main emission drivers and support them in developing transition plans, particularly around renewable electricity and electrification of vehicle fleets. By leveraging our own sustainability expertise, we provide training and practical guidance to member firms, encouraging the adoption of greener practices in buildings, mobility, and procurement. These interventions are designed not only to meet regulatory requirements but also to drive broader change throughout the KPMG network and its value chain.

The full details of these measures and supporting data are documented in the chain analysis reports: Chain Analysis Purchased Goods & Services - Insourcing.



## 3.5 Ambition

The objectives and measures taken by KPMG as described in this chapter were evaluated based on the SKAO list of measures which categorizes them into A, B and C<sup>4</sup> based on different levels of implementation.

- KPMG scores 2 out of 17 on category A ('standard' level of implementation);
- KPMG scores 6 out of 17 on category B ('advanced' level of implementation);
- KPMG scores 9 out of 17 on category C ('ambitious' level of implementation).

Considering our reduction target for 2030, the measures identified in the SKAO list, and a comparison with similar organizations within our industry, KPMG can be classified as progressive in its objectives. This progressive stance is reflected not only in the number and ambition level of our measures, but also in our approach to continuous improvement and transparency. By regularly evaluating our objectives and interventions against recognized frameworks such as the SKAO list, we ensure that our decarbonization strategy remains robust and aligned with best practices in the sector. Furthermore, benchmarking our progress against peer organizations helps us to identify new opportunities for improvement. Through this ongoing process of assessment, comparison, and adaptation, we are committed to driving meaningful CO<sub>2</sub> reductions both within our own operations and across our value chain.

<sup>&</sup>lt;sup>4</sup> Handbook CO<sub>2</sub> Performance Ladder



# 4 Transparency

## 4.1 Our internal stakeholders

- Board of Management and Supervisory Board; responsible for the development of strategy and policies, decision making and reporting;
- Relevant Business Services departments; responsible for embedding ESG in our business operations and the implementation of Our Impact Plan and our Planet ambitions:
- Our workforce; responsible for their individual contribution to achieving our planet ambitions;
- KPMG International; responsible for SBTI validation of target setting, global strategies and knowledge and best practices sharing.

## 4.2 Our external stakeholders

- Clients and business partners; they are increasingly asking us to take responsibility for reducing our footprint and to be transparent about our performance (please refer to chapter 6 for the project with CO<sub>2</sub>-related award advantage);
- Suppliers and subcontractors; we have the ambition to make the supply chain more sustainable together and to strengthen our cooperation in this area, also to reduce scope 3 emissions:
- NGO/governmental bodies or cooperation initiatives with other organizations; they
  require from us to take our responsibility to reduce our footprint and to be
  transparent about it;
- Scientific/knowledge institutes; we are working together to accelerate the transition to a sustainable future.

Table 6 below is a summary of our communications plan for our decarbonization ambitions, strategy, targets, actions and progress regarding our CO<sub>2</sub> emissions.



Communication assets	Communication channels	Frequency	Target audience	Responsible
Internal				
Integrated annual report	Intranet   Inside.nl	Yearly	All KPMG employees	Leadership
Our Impact Plan, Intranet articles: Progress on our CO <sub>2</sub> emission reduction targets (CO <sub>2</sub> -Prestatieladder)	Intranet   Inside.nl,	Quarterly	All KPMG employees	CR, Communication team
Business update meetings	MS Teams, physical meetings	Quarterly	All KPMG employees	Leadership
LTA and COO meetings, Partner & Director updates	MS Teams	Quarterly	Leadership Teams, Partners & Directors	Leadership
Update on Milieuhandboek, Mobility policy and Facilities updates	Intranet   Inside.nl	When applicable	All KPMG employees	CR, Environmental Coordinators
Certificates (Ecovadis, ISO 14001, CO <sub>2</sub> -Prestatieladder etc.)	Intranet   Inside.nl	Yearly	All KPMG employees	CR
External				
Integrated annual report	Internet   KPMG.nl	Yearly	Stakeholders KPMG	Leadership
Progress on our CO <sub>2</sub> emission reduction targets (CO <sub>2</sub> -Prestatieladder)	KPMG.nl   SKAO website	Half-yearly	Stakeholders KPMG	CR
Certificates (Ecovadis, ISO 14001, CO <sub>2</sub> -Prestatieladder etc.)	Internet   KPMG.nl	Continuously	Targets (incl. potential clients)	CR
Proposals and tenders	Proposal documents, Client Supplier Codes of Conduct	Continuously	Targets (incl. potential clients)	Pursuits & Insights, CR
KPMG Supplier Code of Conduct	Website, RfPs	Continuously	Suppliers	Procurement
Forms (e.g. Energy- Efficiency Directive)	Governmental organizations	Continuously	Governmental organizations	Facilities
Cooperation meetings	Virtual and physical meetings with Anders Reizen, UN Global Compact	Continuously	NGOs, other companies	CR, Leadership

Table 6: Overview of our internal and external communications regarding our decarbonization ambitions and journey



## 4.3 Internal communication

Effective internal communication is crucial for fostering employee engagement and achieving our decarbonization goals. By keeping everyone informed and involved, we ensure that all team members understand the importance of our sustainability initiatives and their role in driving these efforts. Regular updates, transparent reporting, and interactive platforms like our intranet and ESG Ambassadors network help create a shared sense of purpose and accountability. Furthermore, we regularly run communication campaigns to raise awareness of Our Impact Plan and decarbonization goals.

As described in chapter 1, communications with the leadership and operational team leads takes place regularly through meetings and reports.

## 4.4 External communication

We are committed to transparently sharing our decarbonization goals and progress with our stakeholders, including clients, suppliers, governmental organizations, NGOs, and other partners.

Our Annual Report provides a comprehensive overview of our decarbonization efforts. It includes detailed information on our goals, the measures we are taking to achieve them, and the progress we have made. This report is accessible on our website.

Stakeholders, including suppliers, are actively involved in identifying and implementing reduction measures. In our RfPs for our suppliers and Supply Chain Code of Conduct, we clearly outline our decarbonization ambition and expectations for suppliers. This ensures that our commitment to reducing carbon emissions is integrated into our procurement processes.

Additionally, we incorporate our decarbonization goals and measures into our client proposals, demonstrating our commitment to sustainability and aligning our services with their environmental objectives.

We actively engage with stakeholders through various events, such as of the ESG webinars. We engage regularly in discussions with organizations such as UN Global Compact and Anders Reizen and industry partners (please refer to chapter 5).



# 5 Participation

# 5.1 Collaboration in CO<sub>2</sub> emission reduction programs

In this section, we highlight KPMG's active involvement in  $CO_2$  emission reduction programs and initiatives in collaboration with other organizations. We also demonstrate how KPMG makes a meaningful contribution through the implementation of various projects.

We support companies, NGOs, governments and communities with our expertise and innovative technology to make progress and to achieve goals such as limiting climate change and promoting sustainable growth. In the field of <a href="ESG & Sustainability">ESG & Sustainability</a>, we offer specific services in both Assurance and Advisory, including in the field of <a href="climate risks">climate risks</a> and <a href="decarbonization">decarbonization</a>.

Collaboration is key to reducing our environmental impact and building a more sustainable future. As part of this commitment, we not only collaborate with our chain partners -as described in chapter 3- but also with other organizations on various initiatives aimed at lowering  $CO_2$  emissions. We invest time and budget in various forms of collaboration, sharing our own knowledge and, where possible, making use of knowledge that has been developed elsewhere in order to continuously improve.

# 5.2 KPMG N.V.'s Partnerships and initiatives

#### **Anders Reizen**

KPMG is partner of the Anders Reizen coalition, a platform of Dutch businesses and (non-)governmental organizations, which aims to reduce CO<sub>2</sub> emissions of business travel. In order to achieve these goals, the most effective measures have been translated into a leading program with 'best practices' in which KPMG participates. KPMG has signed the Anders Reizen Pledge, a 'sustainable mobility promise' that each member signs.

#### **SBTi**

The Science Based Targets initiative (SBTi) offers an actionable framework and roadmap for companies and financial institutions to reduce greenhouse gas emissions to mitigate the effects of climate change while supporting long-term sustainable business growth. SBTi is a partnership between CDP, the World Resources Institute (WRI), the World Wide Fund for Nature (WWF), and the United Nations Global Compact (UN Global Compact).



#### **UN Global Compact**

As a special initiative of the UN Secretary-General, the United Nations Global Compact is a call to companies everywhere to align their operations and strategies with ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption, and to take action in support of UN goals. KPMG N.V. supports United Nations Global Compact and engage in programs such as <a href="Climate Ambition">Climate Ambition</a> Accelerator.

### **WBCSD Circularity Transition Indicators (CTI) framework**

KPMG played a pioneering role in the development of the WBCSD Circularity Transition Indicators (CTI) framework, the first global open standard for measuring and monitoring circularity. With the CTI framework, companies can measure and monitor their circular performance uniformly and consistently. Then, in a seven-step process, it outlines how companies can use the insights gained for business decision-making and for creating a circular strategy with circular objectives.

With the CTI framework, companies can take control of their circular transition by assessing the linear risks and discovering circular opportunities.

### **ESG** Innovation Institute

KPMG and Nyenrode Business Universiteit have created the ESG Innovation Institute to help organizations with the transition to sustainability. It makes the latest ESG knowledge, skills and eco-system accessible to anyone who wants to accelerate the route to sustainability professionally and deliberately.

Since its establishment in 2023, over 200 KPMG partners and directors, as well as executives from client companies, took part in the ESG executive program, developed jointly with the Nyenrode Business Universiteit

In addition to educational offerings, the ESG Innovation Institute also includes an academic ESG chair at Nyenrode from which research, scientific publications, and opinion and debate emerge.

## **Collaboration between KPMG and Naturalis**

KPMG has entered into a partnership with Naturalis Biodiversity Center, the national research institute for biodiversity and natural history museum. In this collaboration, two worlds come together: Naturalis' scientific knowledge in the field of biodiversity and KPMG's experience in the field of advice on sustainability, strategy and implementation. Thanks to this collaboration, organizations and companies can be better advised about the impact they have on nature and biodiversity.

#### **ESG Experts Podcast Series**

KPMG hosted the ESG Experts podcast series to provide insight into various CSRD-related issues and how you can take concrete steps to resolve them.



## **George Molenkamp Thesis Award since 2017**

The George Molenkamp Sustainability Thesis Award is a collaborative initiative between KPMG and Amsterdam Business School and has been presented annually since 2017. The award is in honor of Dr George Molenkamp, a pioneer in the field of sustainable entrepreneurship. Dr. Molenkamp is a former partner and chairman of KPMG Sustainability Services and he was instrumental in the development of environmental and sustainability management and auditing.

#### **RSM Thesis Award**

The annual KPMG-RSM Master Sustainability Thesis Award aims to reward work that combines academic excellence and business relevance in the field of sustainability management.



# 6 Projects with CO<sub>2</sub>-related award advantage

KPMG has been awarded an advantage in alignment with the CO2 Performance Ladder for the following engagements:

- Project Development and management of advanced analytics solutions for ProRail B.V.
- Project "Beleidsadvies- en Ingenieursdiensten (BADI-3)" for the Ministry of Infrastructure and Water Management
- Project "Financiële Adviesdiensten", Perceel 5: Inhuur en resultaatgerichte financiële adviesdiensten beleid en financieel onderzoek"

For all these projects, KPMG applies the same approach to maximize sustainability in project execution. This includes implementing our own decarbonization strategy and promoting sustainable travel. The focus is on minimizing the carbon footprint by integrating low-carbon solutions and encouraging the use of public transport or other sustainable travel options for all project-related activities.

### Example - ProRail B.V.:

For the ProRail project, the overall footprint consists only of mobility and is very limited. The work is performed at the ProRail office, KPMG's own office, or from home. No specific reduction targets have been agreed upon, but the following sustainable travel measures are applied:

- Project teams are present at the ProRail Inkpot office in Utrecht one day per week for collaboration.
- More than 90% of commuting is done by public transport, bicycle, or on foot.
- On other days, team members work from KPMG offices near their home or from home to minimize travel distances.



# 7 Annex: ISO 14064-1 checklist

The emission inventory in this report has been created in accordance with ISO 14064-1 standards for greenhouse gas reporting. The table below summarizes the ISO requirements along with the relevant documents that fulfil these criteria.

ISO 14064-1	Specific § 9.3	Description	Location in the report
	Α	Reporting organization	1.2.2
	В	Person or entity responsible	1.2.2
	С	Reporting period	1.2.1
5.1	D	Reporting boundaries	1.4
	E	Documentation of reporting boundaries, including criteria determined by the organization to define significant emissions	1.4
5.2.2	F	Direct GHG emissions	2.2
Appendix D	G	Combustion of Biomass	2.2
5.2.2	Н	GHG removals	2.2
5.2.3	1	Exclusion sources or sinks	2.2
5.2.4	J	Indirect GHG emissions	2.2
6.4.1	K	Base Year	2.2
6.4.1	L	Explanation changes to Base Year	2.3
6.2	M	Methodologies	2.3
6.2	N	Changes of Methodologies	2.3
6.2	0	Emission or Removal Factors Used	2.3
8.3	Р	Uncertainties	2.3.2
8.3	Q	Description of results of uncertainties assessment	NA
	R	Statement of accordance with ISO 14064	1.1
	S	Statement of verification of the emissions inventory, including level of assurance	2.3
	Т	GWP values used in the calculation, as well as their source	NA

Table 7: ISO 14064-1 checklist



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