Sustainability Report



2026

brockwell energy

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Foreword

The transition to a more sustainable economy is reshaping how organisations operate, invest and create value. Climate change, biodiversity loss, inequality and pressure on natural resources are interconnected challenges that demand decisive action. They also require honesty about the trade-offs, dependencies and uncertainties involved.

Our responsibility is not simply to respond to these changes, but to help shape a future in which business success contributes to a resilient environment and a fairer society. Sustainability must therefore be embedded in the decisions we make, the partnerships we form and the way we measure performance.

During the past year, we have focused on establishing Brockwell's baseline position across key environmental, social and governance topics. We commissioned a full audit across our business which generated a clear action plan and priorities to inform our forward-looking strategy. As an immediate priority from this audit, we have already strengthened the governance, data and accountability needed to turn our commitments into measurable progress. This report sets out where we are as a business, establishing a baseline and associated strategy for improvement. It reflects our commitment to evidence-based decision-making and to reporting information that is traceable, balanced and of value.

Our priorities are clear. We aim to reduce emissions across our operations and value chain, support the transition to low-carbon solutions and manage our impacts on nature and communities. We will work to enable positive environmental and social value in the local communities within which our projects are constructed and operate for the long-term. We will also instil an enhanced understanding and mitigation of climate risks impacting our assets.

None of this can be achieved by one organisation acting alone. Meaningful progress depends on collaboration with employees, customers, suppliers, investors, governments and communities. By combining their perspectives and capabilities with our own, we can develop solutions that are more effective, equitable and durable.

Our goal is to build a business that is resilient, trusted and capable of creating enduring value. That means looking beyond short-term outcomes and considering the consequences of our decisions for people, the planet and future generations.

We remain committed to turning that ambition into action - and to being accountable for the results.

Neil Young
Chief Executive Officer





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01 Sustainability strategy

Our ambition for sustainability

Brockwell Energy was established to deliver energy projects that meet sustainability challenges, especially in areas where the natural environment has been degraded and/or communities are under-served.

We intend to increase our support for the transition towards a sustainable economy by delivering more sustainable projects that benefit communities, and continue to operate a responsible business that respects our customers, employees, supply chain, partners and investors.

Sustainability priorities

To deliver on our ambition, we have set four key sustainability priorities for our business to focus on:

01 Reducing greenhouse gas emissions

Objective: Deliver low carbon energy projects that support the transition to a low-carbon economy, and seek to reduce the lifecycle greenhouse gas emissions of our projects.

Key Actions:

- By 2028, establish a carbon baseline and reduction pathway to net zero emissions by 2050 for emissions, with interim targets.
- Integrate greenhouse gas emission footprint assessment into procurement and investment decisions.

Target:

- Achieve net zero emissions from our financed projects by 2050.

02 Improving resilience to climate change

Objective: Improve the resilience of our projects to the physical and operational impacts of climate change.

Key Actions:

- Assess event-driven (acute) and long-term (chronic) climate-related risks to our projects, such as flooding, extreme weather, heat, and water stress.
- Develop risk-based asset resilience plans for our projects to cope with these risks.
- Incorporate risk-based climate resilience into project design and asset management.

Target:

- By March 2027, complete climate risk assessments for all development projects that have obtained planning consent, and incorporate climate resilience planning into project development and design process.
- Disclose material summary findings of our review of our portfolio's physical climate risk exposure in our 2027 Sustainability Report.
- Implement resilience actions for all identified high-risk areas.

03 Restoring nature & biodiversity

Objective: Prevent the decline of natural ecosystems, habitats and biodiversity by enhancing nature at our projects.

Key Actions:

- Deliver biodiversity enhancements at sites and projects, for example by increasing native planting and pollinator-friendly habitats.
- Reduce environmental impacts through project planning and design, and responsible land management.

Target:

- By 2028, undertake a review of the development portfolio to identify opportunities for specifically defined, measurable biodiversity improvements across identified relevant projects.

04 Supporting local communities

Objective: Create positive environmental and social value in the local communities where our projects are built and operate.

Key Actions:

- Support local environmental and social initiatives through community funding.
- Encourage stakeholder engagement and support staff volunteering activities.
- Promote local procurement where practical.

Target:

- Deliver at least one measurable community sustainability initiative annually.
- By 2035, deliver a community shareholding in a wind farm, over and above standard community benefit.

Our commitment to responsible business

In delivering our projects with sustainability at heart, we will carry out our business as a responsible company by applying the following principles:

- Managing and reducing the carbon footprint of our corporate activities.
- Applying good governance practice, with clearly-assigned responsibility and accountability.
- Being an ethical and responsible employer and supply chain partner, respecting human rights and reducing risks of modern slavery and forced labour.
- Integrating sustainability into our project development & approval process, strategic planning and risk management; and
- Continuing to monitor and report on our sustainability progress annually.

02

Sustainability performance

Key performance indicators for 2025-26[1]

665
MW
energy storage capacity in development

235
MW
wind energy generation capacity in development

873
MW
solar energy generation capacity in development

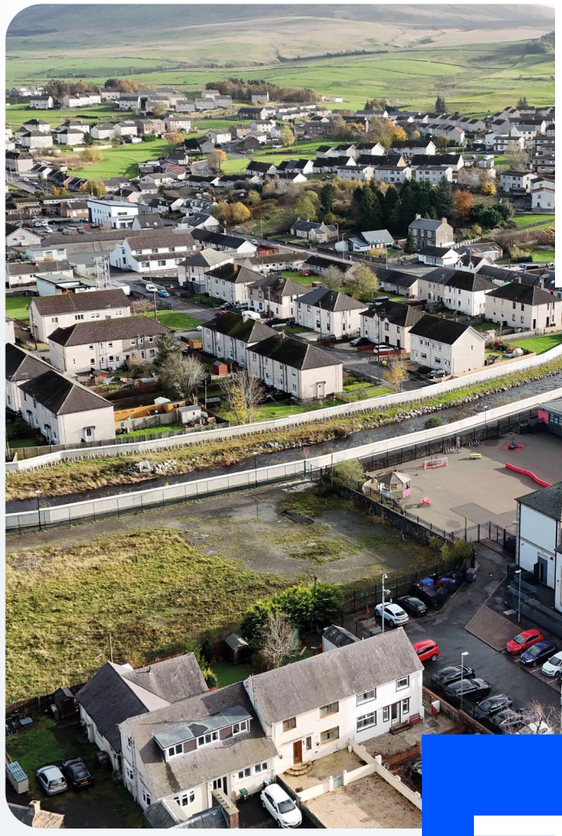
[1] Please refer to the Methodology appendix for details

67
kilotonnes CO_2e
net greenhouse gas emissions avoided[2]

90
kilotonnes CO_2e
greenhouse gas emissions footprint

[2] Net emissions avoided is total avoided emissions minus emissions footprint; please refer to the Methodology appendix for details





£628k
Community benefit funding deployed



384
GWh
renewable energy generated

99
kilotonnes waste diverted from landfill

2
kilotonnes waste sent to landfill

0
reportable health & safety incidents

03



Our approach to sustainability

The purpose of this first Sustainability Report for Brockwell Energy is to communicate our approach and progress on the sustainability issues that are most material to us and our stakeholders, and form a baseline approach for future disclosure.

In 2026 we commissioned a comprehensive external review of our approach to sustainability, which identified our key stakeholders and the sustainability issues that are most material to stakeholders and our business. The review identified the priorities in our new Sustainability Strategy and highlighted areas for strengthening and improvement – we seek to be transparent in this report about where we plan to improve our approach.

This report has been produced with reference to good practice approaches set out in widely-recognized standards and guidance. We are striving towards achieving the required standards and delivering a road map to ensure compliance with those standards[1].

As described in our Sustainability Strategy, we are committed to improving our approach to sustainability – as we work to collect better data and improve our management of sustainability issues, we intend to improve our disclosure and reporting and achieve better alignment to industry standards.

We assess, monitor, manage and report sustainability issues associated with our company activities under three areas: Environmental, Social and Governance.

[1] Please refer to the Methodology appendix for details

North Kyle Wind Farm, East Ayrshire

Environmental

Greenhouse gas emissions

As a developer and owner of renewable energy generation and energy storage projects in the UK, we have an inherent focus on reducing greenhouse gas emissions, as these projects contribute to the decarbonisation of the UK's energy system. As shown in our key performance indicators, our projects avoided 66,617 tonnes of CO_2 equivalent emissions in the 2025-26 financial year[2].

Reducing greenhouse gas emissions is therefore one of our four priorities set in our new Sustainability Strategy.

However, we acknowledge that our corporate activities and our projects still have a carbon footprint across their lifecycle, and so we are committed to working to reduce that footprint – as part of the Sustainability Strategy, we have made an initial commitment to achieve net zero greenhouse gas emissions from our financed projects by 2050. This aligns to the UK's 2050 net zero target and therefore supports the ambitions of international climate goals such as the 2015 Paris Agreement.

[2] Please refer to the Methodology appendix for details

We plan to deliver this priority objective through the following actions:

- Working to develop more low-carbon electricity generation projects and energy storage projects that contribute to the decarbonisation of energy supply in the UK.
- Obtaining more accurate data on the lifecycle emissions footprint of our projects, so that we can develop an accurate emissions baseline and reduction pathway towards our 2050 net zero target.
- Integrating emissions footprint information into our procurement and investment decision-making process.
- Reporting our emissions annually.



> “...we still focus on finding ways to make our projects even more sustainable.”

The following table reports our greenhouse gas (GHG) emissions[1] for the 2025-26 financial year:

GHG emission scope	2025-26	Notes
Scope 1: Direct GHG emissions	**5,177 t CO_2e**	
Controlled projects’ Scope 1 emissions	5,177 t CO_2e	Emissions associated with project land use change and oxidative loss of soil carbon
Scope 2: Electricity indirect GHG emissions	**8 t CO_2e**	
Location-based	8 t CO_2e	Office electricity use
Market-based	0 t CO_2e	Brockwell Energy sources 100% zero-emission energy tariffs for its office electricity use
Scope 3: Other indirect GHG emissions	**84,374 t CO_2e**	
Corporate travel emissions	17 t CO_2e	
Controlled projects’ Scope 3 emissions	30,813 t CO_2e	
Financed projects’ emissions	53,544 t CO_2e	

[1] Please refer to the Methodology appendix for details

Physical climate resilience and adaptation

As the effects of climate change and its potential to harm the economy, environment and society become more pronounced, we are evaluating the risks to our activities posed by climate change. Improving resilience to acute and chronic climate-related risks to our projects is therefore one of four core priorities in our Sustainability Strategy.

To date, our evaluation of physical climate-related risks has been undertaken on a case-by-case basis, with individual project assessments for risks such as flood or fire risk carried out as required for project permitting and consents.

Going forwards, we have made a commitment to a climate risk strategy that:

- Integrates climate resilience planning into project development and design.
- Requires a climate risk assessment[1] to be undertaken for all projects in advanced development, i.e. those that have obtained planning permission.
- Will incorporate the findings of this climate risk assessment into detailed project design and resilience planning.

We have started the process of undertaking climate risk assessments on our portfolio of assets, with the intention that

> these assessments will allow us to determine the climate resilience of our business

and make disclosures aligned to the recommendations of the Task Force on Climate-related Financial Disclosures (TFCD)[2] in our future sustainability reporting.

Climate transition risk

Climate transition risk is defined as “Risks that arise from efforts to transition to a lower-carbon economy.”[3] Our business strategy is focussed on the development of technologies and projects such as wind and solar renewable energy generation and energy storage, all of which are designed to reduce greenhouse gas emissions and facilitate the transition to a lower-carbon economy.

> We therefore regard our business as transition-aligned, with a very low climate transition risk.

Nevertheless, we still focus on finding ways to make our projects even more sustainable – as described above, we are committed to measuring the lifecycle emissions footprint of our projects and identifying ways to reduce this in line with our 2050 net zero target.

A specific example of this is the Earls Gate Energy Centre project, for which we have been actively investigating ways to further reduce its carbon footprint by exploring opportunities to retrofit Carbon Capture technology – please refer to Case Studies for more information.

[2] TCFD recommendations are now integrated into IFRS sustainability standards: https://www.ifrs.org/issued-standards/ifrs-sustainability-standards-navigator/

[3] International Sustainability Standards Board (2023). IFRS S2: Climate-related Disclosures. https://www.ifrs.org/issued-standards/ifrs-sustainability-standards-navigator/ifrs-s2-climate-related-disclosures/

Nature and biodiversity

As a project developer with a strategic focus on delivering renewable energy and storage projects, particularly in post-industrial locations that have been environmentally degraded, we have high potential to deliver effective restoration and enhancement to natural ecosystems and biodiversity. This has led us to identify restoring nature and biodiversity as one of the four priorities of our Sustainability Strategy.

Planning regulations in the UK require all developments to mitigate significant adverse effects on nature and biodiversity, with developments in England additionally required to deliver at least 10% biodiversity net gain, and large projects in Scotland required to enhance nature and biodiversity to a "demonstrably better state". As we progress our projects through the development process, we identify the potential for nature and biodiversity enhancement alongside designing environmental mitigation and compensation for any adverse effects identified during site assessment.

As part of our Sustainability Strategy, we are committed to carrying out a review of our portfolio of projects under development to identify opportunities for biodiversity improvements. This will allow us to set specific, defined targets for later monitoring and delivery. We aim to have completed this review by 2028.

Waste management and resource efficiency

Renewable energy generation projects improve resource efficiency by exploiting renewable resources and displacing the use of non-renewable, finite fossil fuels for energy generation.

Our energy from waste facilities generate a mix of renewable and non-renewable energy, as they recover energy from a mix of renewable 'biogenic' waste materials (such as paper, cardboard and wood waste) and non-biogenic waste materials (such as non-recyclable plastics).

Energy from waste facilities also divert waste from landfill and use it for energy recovery – this moves waste up the waste hierarchy from 'Disposal' to 'Recovery'.

Artists impression of Breezy Hill Visitor Centre, by LEKCO Architecture



"...we have high potential to deliver effective restoration and enhancement to natural ecosystems and biodiversity."

The following table details the resource efficiency metrics for our operational projects[1]:

Operational projects' resource efficiency metrics	2025-26
Renewable energy generation capacity	228 MW
Renewable energy generated	384 GWh
Non-renewable energy generated	49 GWh
Waste recovered for recycling	23,619 t
Waste diverted from landfill (gross)	101,197 t
Waste sent to landfill	2,197 t
Waste diverted from landfill (net)	99,000 t

[1] Please refer to the Methodology appendix for details

Other environmental impacts and risks

Construction and operation of our infrastructure projects have the potential to generate other adverse environmental impacts or risks such as pollution risk, water quality, air quality, drainage or water consumption impacts.

The statutory planning and environmental permitting regimes in the UK require us to assess and mitigate or manage these risks and impacts through the development, construction and operational phases of all of our projects.

Our larger projects, such as solar or wind energy farms, may require an Environmental Impact Assessment (EIA) to be undertaken and mitigation to be designed before the project is consented. Smaller projects, such as battery energy storage systems, may not require a full EIA but a more limited set of focussed assessments, such as a fire risk assessment.

Consent for a project will typically set conditions to be followed during construction and operation, such as the requirement for a Construction Environmental Management Plan to be approved by the relevant consenting or regulatory body.

Furthermore, operational projects may have permits in place that specify technical operating parameters. For example, our energy from waste projects must comply with permits from the Scottish Environment Protection Agency (SEPA) that require ongoing monitoring of emissions to air.

We manage compliance with environmental consenting and permitting requirements through the application of our environmental management system, against which we have certification to the ISO 14001 standard and are annually audited. Our most recent audit concluded that Brockwell Energy has

> **“effective systems to manage the processes reviewed.”**

We have ongoing internal environmental incident and near miss reporting, and discuss key environmental issues as a standing meeting in each management meeting. As part of this review, we require our contractors to manage risks effectively, and monitor their performance.

The following table details environmental monitoring metrics for our projects in construction and operation[1]:

Construction and operational projects’ environmental monitoring metrics	2025-26	Notes
Reportable environmental incidents	0	
Environmental incident near misses	0	
Permit breaches	18	Notifications submitted to regulator in accordance with permit requirements; all instances investigated with corrective action plans implemented and accepted by regulator

[1] Please refer to the Methodology appendix for details

Social

Health, safety and wellbeing

The health, safety and wellbeing of our staff, suppliers and contractors is of paramount importance to our business.

We manage health and safety (H&S) risk primarily through the application of our H&S management system, against which we have certification to the ISO 45001 standard and are annually audited. Our most recent audit concluded that Brockwell Energy has “effective systems to manage the processes reviewed.”

We have ongoing internal H&S incident and near miss reporting, and a review of H&S issues is a standing meeting for each management meeting. We also require our contractors to manage H&S risks effectively and monitor their performance.[4]

The following table details the H&S monitoring metrics for our projects in construction and operation[1]

Construction and operational projects’ H&S monitoring metrics	2025-26	Notes
RIDDOR reportable incidents[4]	0	
Lost Time Accidents	0	
First aid cases	7	All treated on site
High potential near misses	1	No injuries – all incidents investigated with corrective action plans implemented
Near misses	16	

[1] Please refer to the Methodology appendix for details

[4] Incidents reportable to the Health and Safety Executive in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations. https://www.hse.gov.uk/riddor

> **Our people are central to the long-term success of Brockwell, and we are committed to creating a workplace where employees feel supported, valued and able to perform at their best.**

We recognise that wellbeing encompasses both physical and mental health, and we continue to invest in initiatives that support our colleagues throughout their careers.





To support employee wellbeing, we provide a range of benefits and resources, including:

- Employee Assistance Programme (EAP) through Enjoy Benefits, providing confidential advice and support for employees and their families.
- Private Medical Insurance and Income Protection, including access to mental health support through our Vitality Group Income Protection provider where appropriate.
- Group Life Assurance, providing additional financial security for employees and their families.
- Employee Benefits Platform, giving colleagues access to retail discounts, wellbeing resources and lifestyle savings through Enjoy Benefits.
- Flexible and hybrid working, where operationally appropriate, supporting a healthy work-life balance.

Alongside our employee benefits, we continue to promote a positive wellbeing culture through regular wellbeing initiatives, such as Wellness Wednesdays. Through regular employee engagement, including workplace pulse surveys,

we actively seek feedback to better understand the experiences of our people,

identify opportunities for improvement and shape initiatives that strengthen communication, collaboration and ways of working across the business.

Diversity, equity & inclusion

We are committed to an inclusive, equitable working environment free from bullying, harassment, victimisation and unlawful discrimination,

where all employees have equal opportunities to contribute, develop and succeed, regardless of background or personal characteristics.

Our approach is supported by a suite of people policies which have recently been reviewed, updated and consolidated into a single Employee Handbook, making expectations, employee entitlements and reporting routes clearer and more accessible. The handbook is complemented by standardised employment documentation and HR processes to promote fairness, consistency and transparency throughout the employee lifecycle.

Key policies include:

- Equality, Diversity & Inclusion
- Bullying & Harassment
- Dignity at Work
- Grievance
- Disciplinary
- Flexible Working
- Family Leave Policies (Maternity, Paternity, Adoption and Shared Parental Leave)
- Whistleblowing

We also recognise that inclusion extends beyond policies alone. Through regular employee engagement, including workplace pulse surveys, we seek feedback to better understand employee experience, identify opportunities for improvement and ensure our workplace continues to evolve as the business grows.

We expect our suppliers, contractors and business partners to uphold similar standards and to treat their employees fairly, ethically and with respect.





Community benefits and engagement

We have a track record of developing projects on brownfield, ex-industrial sites that are often associated with struggling communities. This gives us high potential to deliver significant community benefits, and we have therefore set supporting local communities as one of the four priorities of our Sustainability Strategy.

Through the development process we engage with local communities to try to secure support for our projects, and identify ways in which our projects can support their communities. In England and Scotland, government policy is for onshore wind energy projects to provide £5,000 of community benefit funding per MW of installed generating capacity for each year of operational life, and we are committed to meeting this requirement.

Our projects have already delivered above and beyond this minimum requirement, with the North Kyle Wind Farm providing over £2 million for the establishment and initial funding of a local community group coordinating community benefit funding from multiple wind farm projects across East Ayrshire – please refer to Case Studies for further information.

The following table details the community benefits metrics for our projects in construction and operation[1]

Construction and operational projects' community engagement metrics	2025-26	Notes
Community benefit funding deployed		
In year	£628,000	
To date	£2,721,000	
Community benefit funding committed		
To date	£31,540,000	Yearly community benefit funding from wind farms will increase in line with inflation, meaning expected total lifetime funding is expected to exceed £60 million over the next 40 years

Modern slavery and forced labour risk

There is a potential risk of modern slavery or forced labour arising in our project or corporate supply chains, due to the presence of high-risk industries and geographies in those supply chains.

In the project supply chain, suppliers of solar photovoltaic panels and equipment for battery energy storage systems are especially high risk, particularly those sourced from East and Southeast Asia. Risks are also present in the supply chains for our waste management projects. In our corporate supply chain, there are some risks in the services sector (for example cleaners and waste collection providers).

We take a proactive approach to investigating the risk of modern slavery and forced labour in our supply chains so that we can eliminate it. We address this principally by carrying out due diligence on our suppliers and contractors to evidence that they have suitable risk controls in place to identify and eliminate modern slavery and forced labour.

This requires them also to look down the length of their supply chain and apply requirements to their tier 2 and 3 suppliers to ensure that they, respectively, have eliminated modern slavery and forced labour risk.

As well as applying a risk-based due diligence approach, we specify in our contracts that our suppliers must continue to monitor the modern slavery and forced labour risk in their supply chain, and report to us any incidences or specific identified risks.

To date we have not identified any incidences or specific identified risks of modern slavery or sourced labour in our supply chains, and are satisfied with the proactive approaches of our suppliers in assessing and monitoring these risks.

Other social impacts and risks

Construction and operation of our infrastructure projects have potential to generate other adverse social impacts or risks, for example cultural heritage/ archaeology, landscape, visual, noise or amenity (including solar glint/glare, wind turbine shadow flicker, odour or traffic) impacts.

As with environmental impacts and risks, these social impacts and risks are addressed through the statutory planning and environmental permitting regimes. For projects not requiring a full EIA, non-statutory assessments (such as a landscape and visual impact assessment) are typically undertaken.

Our ISO 14001 certified environmental management system is used to ensure compliance with consenting and permitting requirements.

We maintain a formal dedicated stakeholder mechanism through which stakeholders can raise concerns, complaints or queries relating to our activities and projects.

All grievances are appropriately recorded, assessed and managed by the relevant team, with proportionate investigation and follow-up undertaken where required. We seek to ensure that grievances are addressed transparently and within a reasonable timeframe, with appropriate feedback provided to the complainant on the outcome and any remedial actions identified.

The following table details the social monitoring metrics for our projects in construction and operation[1]:

Construction and operational projects' social monitoring metrics	2025-26	Notes
Complaints received	2	Environmental complaints investigated by regulator – not substantiated

[1] Please refer to the Methodology appendix for details

Governance

We believe that effective governance is a cornerstone of operating a sustainable and resilient business.

We have established a number of policies to ensure effective governance of the issues described in this section, and ensure that our employees are aware of and trained in their requirements.

The Board of Brockwell Energy Limited has overall responsibility for the implementation of these policies, although each policy is assigned a policy owner to ensure day-to-day accountability for ensuring that policies are reviewed at least annually and implemented effectively.

Business conduct

Our governance arrangements for responsible business conduct include policies and processes to address the following issues and risks:

- Anti-corruption and bribery
- Anti-money laundering
- Anti-competitive and cartel behaviour
- Conflicts of interest

These policies are available to view on the Responsibility page of our website.

We expect the highest standards of our employees for business conduct, and have a zero-tolerance approach to wilful or grossly negligent breaches of these policies. We ensure that relevant staff are trained on these business conduct risks.

Modern slavery & forced labour: policy & compliance

The above section in Social on modern slavery and forced labour risk describes how we assess and manage risks in our supply chain. From a governance perspective, the management and Board of Brockwell Energy has a responsibility to ensure that we have a comprehensive policy that is effectively applied to eliminated modern slavery and forced labour from our businesses and supply chains.

Our Anti-Slavery & Human Trafficking policy can be viewed on the Responsibility page of our website.

In the financial year 2025-2026, Brockwell Energy Limited first came within the scope of the Modern Slavery Act. We therefore published a Modern Slavery Transparency Statement for 2025-26 in accordance with the requirements of the Act – this can be viewed on the Responsibility page of our website.

Whistleblowing and speak-up culture

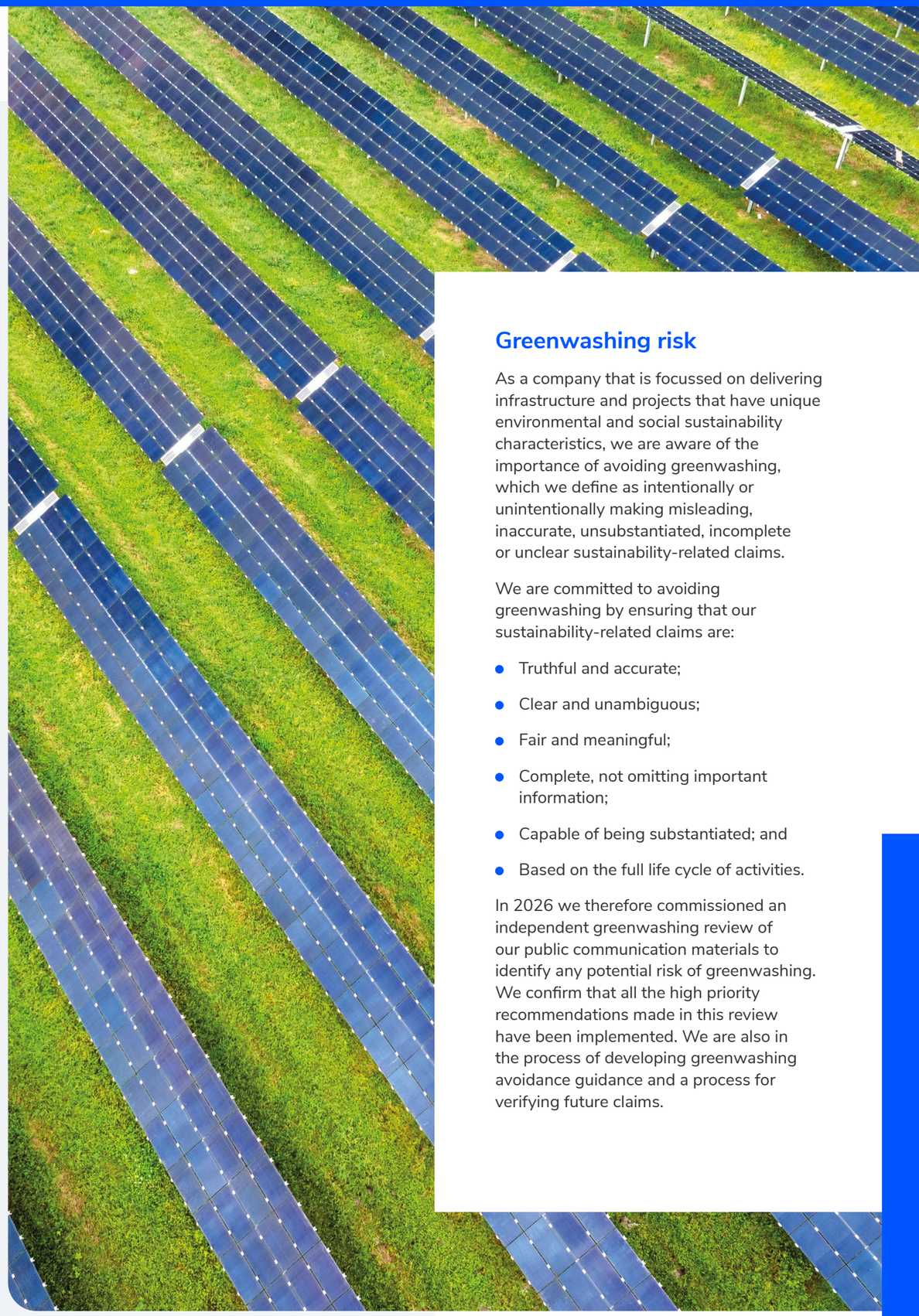
Whistleblowing is the disclosure of information which relates to suspected serious wrongdoing or serious dangers at work.

We are fully supportive of employees and suppliers who raise genuine whistleblowing concerns, and encourage them to do so. Whistleblowers can raise concerns anonymously if they wish, and are protected from retaliatory or detrimental treatment.

Data protection and cybersecurity

As owners and operators of significant infrastructure projects, we are aware that our business and projects are potential targets for cyber-attacks, and that we have obligations to protect sensitive data that we may hold. We have an internal IT and Information and Security Policy and a General Data Protection Regulations Policy, and staff receive monthly cybersecurity training.

To improve our data protection and cybersecurity arrangements we have commissioned an external cybersecurity review. We will report on any significant steps taken as a result of this review in our next Sustainability Report.



Greenwashing risk

As a company that is focussed on delivering infrastructure and projects that have unique environmental and social sustainability characteristics, we are aware of the importance of avoiding greenwashing, which we define as intentionally or unintentionally making misleading, inaccurate, unsubstantiated, incomplete or unclear sustainability-related claims.

We are committed to avoiding greenwashing by ensuring that our sustainability-related claims are:

- Truthful and accurate;
- Clear and unambiguous;
- Fair and meaningful;
- Complete, not omitting important information;
- Capable of being substantiated; and
- Based on the full life cycle of activities.

In 2026 we therefore commissioned an independent greenwashing review of our public communication materials to identify any potential risk of greenwashing. We confirm that all the high priority recommendations made in this review have been implemented. We are also in the process of developing greenwashing avoidance guidance and a process for verifying future claims.

04

Case studies

North Kyle Wind Farm

North Kyle Wind Farm is a 49-turbine onshore wind energy project located in East Ayrshire, Scotland, on a former opencast coal mine.

With 220.5 MW of generating capacity, the project is expected to meet the equivalent electricity needs of over 190,000 UK homes.

The Brockwell Energy team has developed the project since 2016, with the wind farm becoming fully operational in February 2026.

The project was designed specifically to support restoration of the former Chalmerston and House of Water opencast coal mine sites, which had been abandoned unrestored following the 2013 collapse of Scottish Coal. During wind farm construction, an estimated £7.2m of restoration works, including reprofiling 11 km of haul roads, regrading 59 hectares of opencast backfill and placing peat over 24 hectares.



The project is expected to avoid greenhouse gas emissions of nearly

2.9M

tonnes CO_2

equivalent over its lifetime.

Reducing greenhouse gas emissions

Restoring nature & biodiversity

A Habitat Management Plan to enhance black grouse and peatland habitats has been developed in consultation with stakeholders, and works to implement this – e.g. through native species replanting – are due to start shortly.

The project will provide over

£1.1M

of community support funding

for every year of its operational life, and has already contributed an additional £200,000 to set up the 9 Community Council Group for distributing community benefits.

Supporting local communities

Earls Gate Energy Centre

Earls Gate Energy Centre is an Energy-from-Waste facility in Grangemouth, Scotland,

processing up to 274,000 tonnes of waste each year.

This Combined Heat and Power plant generates steam and electricity which is provided to local industries in the nearby CalaChem site.

The project is a reliable baseload electricity generator, with surplus electricity exported to the National Grid. The project became fully operational in early 2024.

Brockwell Energy developed the project in a 50:50 partnership with Encyclis, with Brockwell Energy Services Limited leading construction from 2022.

The facility is now operated and maintained by Kanadevia-Inova.

Reducing greenhouse gas emissions

We have investigated the potential for capturing carbon emissions from the project, commissioning a preliminary engineering design for the necessary plant, which could potentially capture up to

95%

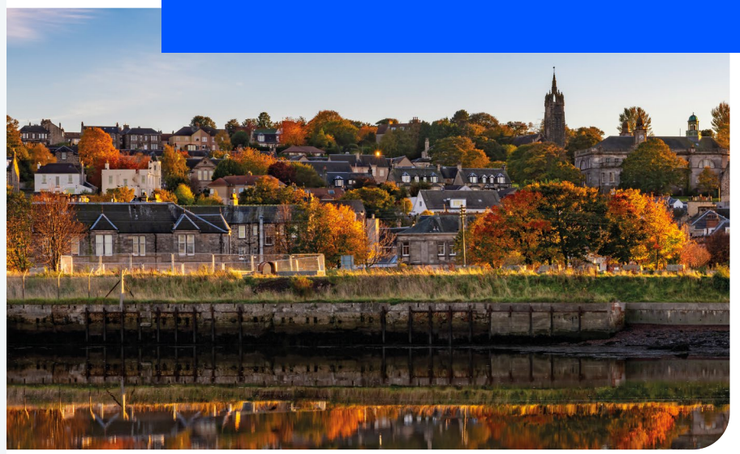
of carbon emissions

The project delivered

£18.5k

of community support funding

during its construction, and has recently relaunched its community fund to provide ongoing support to local community and voluntary projects in and around Grangemouth.



Supporting local communities

Appendix 1: Methodology

Sustainability Reporting

- Brockwell Energy Limited has reported the information cited in this GRI Content Index for the period 1 April 2025 to 31 March 2026 with reference to the GRI Standards. The Brockwell Energy GRI Content Index is available on the Responsibility page of the Brockwell Energy website.
- Brockwell Energy Limited is a private limited company registered in Scotland with company number SC560225 at the following address: The Eagle Building – Third Floor, 19 Rose Street, Edinburgh, Lothian, EH2 2PR. It has operations in the United Kingdom, and its headquarters are located at the above Edinburgh address.
- The reporting period of 1 April 2025 to 31 March 2026 aligns to Brockwell Energy's financial reporting period. Brockwell Energy intends to provide annual sustainability reporting.
- The CEO of Brockwell Energy Limited has reviewed and approved the information reported herein, and the final report has been provided to the Board of Brockwell Energy Limited (the highest governance body of the company) for information. The review and approval process comprised review of draft content by senior managers through the drafting process, and a CEO review of, and comments on, the near-final draft report. In this process, the CEO and Board have relied on evidence supplied to it by managers in the company and (as noted below) information supplied to it by suppliers, controlled subsidiaries and financed companies.
- This report was published on 26 October 2026. Questions on this report should be directed to enquiries@brockwellenergy.co.uk.
- The sustainability topics disclosed in this report have been identified as 'material' to Brockwell Energy and its stakeholders by carrying out a sustainability review that comprised stakeholder mapping, limited stakeholder engagement, and materiality mapping exercise in accordance with the principles of GRI Universal Standard 3: Material Topics 2021. However, this review exercise did not undertake a full stakeholder engagement programme with a broad range of stakeholders, and it is therefore not considered to be in full alignment with GRI 3.
- Alongside our use of the GRI Standards for reporting on our impacts, we have structured elements of this report with reference to the four core content areas set out in IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information, published by the International Sustainability Standards Board (ISSB):
  - **Governance:** the Board of Brockwell Energy Limited has overall responsibility for oversight of the policies described throughout this report, with individual policy owners assigned to each policy area to ensure day-to-day accountability and review at least annually (see Governance). We intend to develop this disclosure further in future reports, including how sustainability-related risks and opportunities more broadly are considered by the Board and reflected in major decision-making.
  - **Strategy:** our Sustainability strategy sets out our sustainability priorities, each with a defined objective, key actions and a measurable target. These priorities reflect the sustainability-related risks and opportunities we consider most relevant to our business and are intended to be integrated into our project development, procurement and investment decision-making as described in the Environmental and Social sections of Our approach to sustainability. We have not yet quantified the anticipated effects of these risks and opportunities on our financial position, performance or cashflows, and intend to develop this analysis as our climate risk assessment programme (see below) matures.
  - **Risk management:** we are at an early stage in developing a structured process for identifying, assessing, prioritising and monitoring sustainability-related risks and integrating this into our overall risk management process. Our current approach is applied primarily at project level, for example through climate-related risk assessments carried out as part of project permitting and consenting (see Physical climate resilience and adaptation). We have committed to extending climate risk assessment to all projects reaching an advanced stage of development, informed by the scenario analysis approach described in IFRS S2 Climate-related Disclosures, and to disclosing the findings of this work, together with a more developed description of our sustainability risk management process, in a future Sustainability Report.
  - **Metrics and targets:** we report a range of metrics against our sustainability priorities, including greenhouse gas emissions (Scopes 1-3) and avoided emissions, renewable energy generation and storage capacity, waste and water performance, health and safety incidents, and community investment (see Key performance indicators and the relevant Environmental, Social and Governance sections). These are supported by targets detailed in our Sustainability priorities.
- As with our use of the GRI Standards, this report is not yet fully compliant with IFRS S1: this first Sustainability Report sets a baseline against which we intend to build in future years.
- We intend to work towards more standards-compliant disclosures in future annual Sustainability Reports.

Key performance indicators

Solar energy generation, wind energy generation and energy storage capacity under development KPIs relate to projects that have received internal approval from Brockwell Energy to proceed from initial site screening to substantive project development. Due to uncertainties beyond the control of Brockwell Energy in the project development process, not all the stated capacity is expected to be delivered as operating assets, nor is it possible to provide a reliable quantified estimate of how much capacity under development will be delivered.

Greenhouse gas emissions

- Greenhouse gas emissions calculation has been carried out in accordance with the GHG Protocol Corporate Accounting and Reporting Standard.
- Scope 2 emissions have been calculated with reference to the GHG Protocol Scope 2 Guidance, applying the Scope 2 Quality Criteria to validate the use of zero-emission energy tariffs for market-based reporting.
- Brockwell Energy's office energy use is metered for the Edinburgh office, allowing for accurate consumption measurement and calculation of Scope 2 emissions using the UK government conversion factors 2025 for company reporting of greenhouse gas emissions. For the London office, metered consumption data is only available for the building rather than Brockwell Energy's individual lease, and so emissions have been estimated on a pro rata basis using the leased office area proportion of the building.
- Scope 3 corporate travel emissions have been estimated using existing travel information and the UK government conversion factors 2025. Due to limited data availability, corporate travel emissions are reported for the period 25 June 2025 to 25 June 2026. We are seeking to improve the accuracy of data collection for calculation of this metric.
- Greenhouse gas emissions and avoided greenhouse gas emissions for our controlled and financed projects are reported by us as the share attributed to Brockwell Energy – organisational boundaries and attribution have been determined using the Operational Control approach described in the GHG Protocol Corporate Accounting and Reporting Standard. Where Brockwell Energy has operational control over a project – described in this report as "controlled projects" – 100% of the project's Scope 1, 2 and 3 emissions are reported here under the respective scopes. Similarly, 100% of the project's avoided emissions are reported here.
- For other projects in which Brockwell has invested – described in this report as "financed projects" – for example joint ventures with shared operational control, the proportional equity share of the project's emissions are reported here under Scope 3, in accordance with the guidance in the GHG Protocol Corporate Value Chain (Scope 3) Standard. Similarly, the proportional equity share of the project's avoided emissions is reported here.
- The Scope 1, 2 and 3 emissions reported, where applicable, therefore include emissions from:

Scope 1	• Brockwell Energy fossil fuels consumed (not applicable in reporting year – no material emissions) • Controlled projects' fossil fuels consumed (not applicable in reporting year – no material emissions) • Controlled projects' land use change and soil carbon oxidation
Scope 2 (dual reporting under market-based and location-based approaches)	• Brockwell Energy purchased electricity • Controlled projects' purchased electricity (not applicable in reporting year – no material emissions)
Scope 3	• Brockwell Energy corporate travel • Controlled projects' asset lifecycle emissions (e.g. manufacturing, transport and installation) • Financed projects' material Scope 1, 2 and 3 emissions

Emissions for projects not controlled or financed by Brockwell Energy Limited or its subsidiaries, e.g. projects to which Brockwell Energy Services Limited provides management services, are not included in this report.

- Financed project emissions and avoided greenhouse gas emissions are reported based on information provided to Brockwell Energy Limited by the projects.
- For the calculation of avoided greenhouse gas emissions, suitable project-specific counterfactuals have been selected where available. For avoided emissions calculated from displacement of grid electricity, the following emission factors have been used:
  - For variable generation projects (e.g. wind energy and solar photovoltaic), the UK Government long-run marginal generation-based emission factor from the year the project commenced operating has been used.
  - For firm generation projects (e.g. Energy-from-Waste), the firm generation emission factor from the UNFCCC Harmonized IFI Default Grid Factors has been used.

Physical climate resilience and adaptation

We will require climate risk assessments to be undertaken in line with good industry practice as defined in the guidance contained in the International Sustainability Standards Board (ISSB) standard IFRS S2: Climate-related disclosures, for example the requirement to use climate-related scenario analysis to assess climate resilience, with such scenarios to be selected on a reasonable and supportable basis.

Waste management and resource efficiency

- Controlled and financed projects' resource efficiency metrics are reported by us as the share attributed to Brockwell Energy – attribution has been calculated using the GHG Protocol Operational Control approach as per greenhouse gas emissions (see above). These metrics are reported based on information provided to Brockwell Energy Limited by the projects.
- Resource efficiency metrics for projects not controlled or financed by Brockwell Energy Limited or its subsidiaries, e.g. projects to which Brockwell Energy Services Limited provides management services, are not included in this report.

Other environmental impacts and risks

- Environmental monitoring metrics are not reported on an attributed basis, but represent the total metrics for all controlled and financed projects in construction or operation during the 2025-26 reporting period.
- Environmental monitoring metrics for projects not controlled or financed by Brockwell Energy Limited or its subsidiaries, e.g. projects to which Brockwell Energy Services Limited provides management services, are not included in this report.

Health, safety and wellbeing

- H&S monitoring metrics are not reported on an attributed basis, but represent the total metrics for all controlled and financed projects in construction or operation during the 2025-26 reporting period.
- H&S monitoring metrics for projects not controlled or financed by Brockwell Energy Limited or its subsidiaries, e.g. projects to which Brockwell Energy Services Limited provides management services, are not included in this report.

Community engagement

- Controlled and financed projects' community engagement metrics are reported by us as the share attributed to Brockwell Energy – attribution has been calculated using the GHG Protocol Operational Control approach as per greenhouse gas emissions (see above). These metrics are reported based on information provided to Brockwell Energy Limited by the projects.
- Community engagement metrics for projects not controlled or financed by Brockwell Energy Limited or its subsidiaries, e.g. projects to which Brockwell Energy Services Limited provides management services, are not included in this report.

Other social impacts and risks

- Number of complaints received is not reported on an attributed basis, but represent the total for all controlled and financed projects in construction or operation during the 2025-26 reporting period.
- Complaint metrics for projects not controlled or financed by Brockwell Energy Limited or its subsidiaries, e.g. projects to which Brockwell Energy Services Limited provides management services, are not included in this report.



The power to thrive

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