

# **ENVIRONMENTAL, SOCIAL & GOVERNANCE POLICY & GUIDELINES**

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### Document Change Control

All changes are to be agreed and authorised by the CEO.

### Document Change Record

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### Document Sign-off

	Signed	Date
CEO		18/02/2025

All changes are logged in the Policies Document Control Register.

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## 1. ABOUT THIS POLICY

- 1.1 Brockwell Energy Limited (the Company), together with its subsidiaries and affiliates, is committed to conducting its business in an environmentally, socially, and ethically responsible manner. We recognise the importance of sustainable and responsible business practices that create long-term value for our stakeholders, employees, customers, and the communities in which we operate.
- 1.2 This policy applies to all aspects of Brockwell Energy's operations, including our corporate offices and our role as owner of construction sites. It sets out the standards and expectations for managing environmental impacts, ensuring social responsibility, and maintaining strong governance practices. This policy applies to all employees, officers, consultants, contractors, volunteers, interns, casual workers, and agency workers.
- 1.3 As the owner of construction sites, Brockwell Energy is committed to embedding Environmental, Social, and Governance (ESG) considerations into project planning, contractor engagement, and ongoing site management. While principal contractors may manage day-to-day construction operations, Brockwell Energy retains oversight to ensure compliance with our ESG commitments.
- 1.4 This policy does not form part of any employee's contract of employment, and the Company may amend it at any time.

## 2. WHO IS RESPONSIBLE FOR THIS POLICY?

- 2.1 The Company's Board of Directors (the Board) has overall responsibility for the effective implementation and operation of this ESG policy. The Board is committed to ensuring that our business practices reflect our values of environmental sustainability, social responsibility, and good governance.
- 2.2 All managers have a specific responsibility to operate within the boundaries of this policy, to ensure that all staff, contractors, and other stakeholders understand their role in meeting the Company's ESG objectives, and to take corrective action when these standards are not upheld.
- 2.3 Staff, contractors, and other stakeholders are encouraged to disclose any concerns related to environmental, social, or governance practices that they become aware of, ensuring that the Company can address any issues promptly and effectively.
- 2.4 Questions about this policy, as well as requests for guidance, support, or training on ESG-related matters, should be directed to the Company.
- 2.5 Staff are invited to provide feedback and suggest ways in which this policy might be improved by contacting the Company.

## 3. ENVIRONMENTAL RESPONSIBILITY

- 3.1 We are committed to minimising our environmental impact by adopting practices that promote sustainability, conserve resources, and reduce waste. Key areas of focus include:

### Travel

- 3.2 Sustainable Travel: We prioritise the use of virtual meetings and collaboration tools to reduce the need for business travel.
- 3.3 Efficient Travel: Where travel is necessary, we encourage the use of public transportation, carpooling, or energy-efficient vehicles to minimise carbon emissions.

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- 3.4 Offsetting Emissions: We will explore carbon offset initiatives for business-related travel that cannot be avoided.

#### **Recycling & Waste Reduction**

- 3.5 Recycling Programs: We maintain comprehensive recycling programs in all offices, including the separation of paper, plastics, metals, and electronic waste.
- 3.6 Reducing Single-Use Items: We strive to eliminate single-use plastics and promote the use of reusable alternatives (e.g., water bottles, utensils, and food containers).
- 3.7 Waste Audits: We conduct periodic waste audits to assess and improve our waste management practices.

#### **Energy Conservation**

- 3.8 Switching Off at Night: All non-essential electrical equipment (e.g., computers, monitors, lights, and appliances) must be powered down at the end of the workday to conserve energy.
- 3.9 Energy-Efficient Appliances: We are committed to using energy-efficient lighting, HVAC systems, and appliances in our facilities.
- 3.10 Renewable Energy: We will explore opportunities to source renewable energy and invest in energy-efficient infrastructure where possible.

### **4. PROJECT CONSTRUCTION SITES: RESPONSIBILITY AS OWNER / CLIENT**

- 4.1 As the owner of construction sites, Brockwell Energy is committed to ensuring that our ESG standards are integrated into every project, even when day-to-day operations are managed by principal contractors. Our responsibilities include:

#### **Setting ESG Standards for Contractors**

- 4.2 Contractual Requirements: We will include clear ESG expectations and standards in all contracts with principal contractors, requiring them to adhere to our sustainability, health and safety, and ethical business practices.
- 4.3 Sustainable Design: We will make environmentally responsible choices in the design phase of construction projects, including energy efficiency, water conservation, and the use of sustainable building materials.

#### **Oversight and Monitoring**

- 4.4 Ongoing Monitoring: We will regularly monitor construction sites to ensure compliance with our ESG goals, either through direct oversight or third-party audits. This includes tracking energy usage, waste management, and safety standards.
- 4.5 Contractor Selection: We will conduct due diligence when selecting contractors, ensuring they demonstrate a strong commitment to environmental and social responsibility.

#### **Environmental Impact**

- 4.6 Waste and Recycling: We will ensure that waste management plans are implemented on all construction sites, including measures for recycling and the reduction of construction waste.
- 4.7 Energy Efficiency: We will encourage the use of energy-efficient construction equipment and explore renewable energy options for site operations.
- 4.8 Air and Water Protection: We will require contractors to implement measures that minimise air pollution (e.g., dust control) and reduce water consumption on-site.

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## Community and Stakeholder Engagement

- 4.9 Community Consultation: We will engage with local communities affected by construction projects, ensuring their concerns are addressed, and minimise disruption from noise, traffic, or other impacts.
- 4.10 Local Employment and Sourcing: We will prioritise the use of local labour and materials to support the economic development of surrounding communities.

## 5. SOCIAL RESPONSIBILITY

- 5.1 Our business is built on respect for people, diversity, and the communities we serve. We are committed to:
  - a. Diversity & Inclusion: Promoting a diverse and inclusive workplace where all employees feel valued and respected.
  - b. Community Engagement: Supporting local communities through volunteer programs, charitable giving, and partnerships with local organisations.
  - c. Health & Safety: Ensuring a safe and healthy work environment for all employees and on construction sites, with regular training on health, safety, and wellness.

## 6. GOVERNANCE

- 6.1 Strong governance is at the core of our business practices, ensuring transparency, accountability, and ethical decision-making. We commit to:
  - a. Ethical Business Practices: Conducting all business activities with integrity, fairness, and in compliance with legal and regulatory requirements.
  - b. Transparency: Regularly reporting on our ESG initiatives, progress, and outcomes to our stakeholders.
  - c. Stakeholder Engagement: Maintaining open lines of communication with employees, customers, investors, and other stakeholders to gather feedback and continuously improve our ESG efforts.

## 7. CONTINUOUS IMPROVEMENT

- 7.1 We understand that ESG is an ongoing journey. Brockwell Energy will periodically review and update this policy to reflect new insights, technologies, and regulatory developments. We are committed to continuously improving our environmental, social, and governance performance.

## 8. CONCLUSION

- 8.1 This policy reflects our commitment to being a responsible corporate citizen. By integrating ESG considerations into our business strategy and operations - both in our daily activities and in our construction projects - we aim to create long-term value while minimising our environmental impact, fostering social responsibility, and upholding strong governance standards.