

CORPORATE SOCIAL RESPONSIBILITY POLICY & GUIDELINES

Revision No:	1
Date:	25 February 2025

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Document Change Control

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

Document Change Record

Revision No.	Date
1	25 February 2025
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Document Sign-off

	Signed	Date
CEO		25/02/2025

All changes are logged in the Policies Document Control Register.

1. ABOUT THIS POLICY

- 1.1 Brockwell Energy Limited (“the Company”), along with its subsidiaries and affiliates, is committed to corporate social responsibility (CSR), ensuring that our operations create positive social, economic, and environmental impact. This CSR Policy outlines our approach to ethical business practices, community investment, and stakeholder engagement, reinforcing our commitment to being a responsible corporate citizen.
- 1.2 This policy applies to all Brockwell Energy activities, including corporate operations and project sites. It establishes our standards for social responsibility, guiding how we engage with communities, support local initiatives, and uphold ethical labor and environmental practices. This policy is applicable to all employees, officers, consultants, contractors, volunteers, interns, casual workers, and agency workers.
- 1.3 Brockwell Energy is dedicated to embedding CSR principles into all aspects of our business. While day-to-day community interactions may be led by project managers or contractors, the Company maintains oversight to ensure that our commitments to social responsibility, transparency, and ethical conduct are upheld.
- 1.4 This policy does not form part of any employee's contract of employment and may be updated by the Company to reflect evolving CSR priorities, community needs, and regulatory standards.
- 1.5 This policy aligns with Brockwell Energy's Sustainability Policy and Community Engagement Policy, ensuring that our CSR initiatives support environmental stewardship, resource conservation, social equity, and long-term community resilience. This policy also aligns with Brockwell Energy's Diversity, Inclusion & Equality (DEI) Policy to ensure that corporate social responsibility initiatives promote inclusivity, fairness, and equal opportunities across all aspects of our business.

2. WHO IS RESPONSIBLE FOR THIS POLICY?

- 2.1 The Board of Directors has overall responsibility for ensuring the effective implementation and operation of this Corporate Social Responsibility (CSR) Policy. The Board is committed to fostering a culture of ethical business practices, social responsibility, and transparency, ensuring that Brockwell Energy operates with integrity and creates positive social and environmental impact.
- 2.2 All managers are responsible for ensuring compliance with this policy, embedding CSR principles into day-to-day operations, and ensuring that staff, contractors, and stakeholders uphold Brockwell Energy's commitments to ethical conduct, community engagement, and sustainability. Managers must also take appropriate action if CSR standards are not met.
- 2.3 Staff, contractors, and stakeholders are encouraged to report any concerns related to corporate social responsibility, ethical business practices, or stakeholder engagement. Open communication is essential to building trust, fostering long-term positive relationships, and ensuring that Brockwell Energy remains accountable for its social and environmental commitments. All concerns will be addressed promptly and appropriately.
- 2.4 Any questions about this policy, as well as requests for guidance, support, or training on CSR-related initiatives and best practices, should be directed to the Company.
- 2.5 Employees and stakeholders are invited to provide feedback and suggest ways to improve this policy to enhance Brockwell Energy's commitment to ethical, transparent, and impactful corporate social responsibility efforts.
- 2.6 Brockwell Energy's commitment to corporate social responsibility is also reflected in our Ethics & Code of Conduct Policy, which sets out the ethical standards and governance principles that guide our interactions with communities, employees, and stakeholders.

3. PURPOSE

- 3.1 The Corporate Social Responsibility (CSR) Policy defines Brockwell Energy's commitment to conducting business ethically and sustainably, creating positive social and environmental impacts, and supporting the communities we serve. This policy sets out our approach to building value beyond energy, focusing on social responsibility, community engagement, and environmental stewardship.

4. SCOPE

- 4.1 This policy applies to all Brockwell Energy operations, projects, and partnerships. It guides our interactions with employees, communities, stakeholders, and the environment, ensuring our business practices align with our values.

5. COMMITMENT

- 5.1 Brockwell Energy is committed to being a responsible corporate citizen. We strive to integrate social, environmental, and ethical considerations into all aspects of our operations, aiming to create lasting value for communities and the environment.

6. PRINCIPLES

- 6.1 Our CSR approach is guided by the following principles:
- **Community Empowerment:** We work alongside communities to create initiatives that promote economic development, education, and wellbeing.
 - **Environmental Stewardship:** We are committed to reducing our environmental impact and supporting biodiversity through responsible project design and operations.
 - **Ethical Business Practices:** Brockwell Energy upholds the highest standards of integrity, ensuring transparency, fairness, and accountability in all interactions. In line with our Anti-Slavery & Human Trafficking Policy, we uphold the highest ethical standards by ensuring that all business activities, supply chain partnerships, and community engagements are free from forced labour, human trafficking, or exploitative practices.

7. IMPLEMENTATION

Community Support and Engagement

- 7.1 We invest in community-driven initiatives, supporting local priorities through community benefit funds, sponsorships, and apprenticeships. By engaging with communities from the outset of each project, we aim to create meaningful, long-term benefits.

Social and Economic Development

- 7.2 Brockwell Energy prioritises local hiring and contracting to strengthen the economic resilience of the areas in which we operate. Our projects are designed to support job creation, skills development, and economic growth within communities.
- 7.3 Our commitment to local hiring and economic resilience is further supported by our Recruitment Policy, which ensures that hiring and employment practices are fair, inclusive, and aligned with our broader corporate social responsibility commitments.

Environmental Responsibility

- 7.4 Our CSR efforts include initiatives to conserve resources, minimise environmental impact, and promote sustainability. We engage in habitat restoration, land reclamation, and community-focused environmental projects to enhance the ecosystems surrounding our projects.

Ethical Governance and Compliance

- 7.5 Brockwell Energy operates in full compliance with legal and regulatory standards, fostering an ethical culture that respects human rights and prioritises transparency. We maintain zero-tolerance for corruption, discrimination, and unethical practices, ensuring our operations are conducted with integrity.
- 7.6 Brockwell Energy's approach to ethical governance aligns with our Diversity, Inclusion & Equality (DEI) Policy and Recruitment Policy, ensuring that we foster an inclusive, diverse, and discrimination-free workplace while maintaining fair and transparent hiring processes.

Transparency and Accountability

- 7.7 We are committed to open communication with our stakeholders, regularly reporting on our CSR activities and sharing updates on our social and environmental impact. This transparency reinforces our accountability and commitment to positive social responsibility.

8. CONCLUSION

- 8.1 This Corporate Social Responsibility (CSR) Policy reflects Brockwell Energy's dedication to making a lasting, positive impact through ethical, community-focused, and environmentally responsible practices. Our commitment to CSR drives us to act with integrity, support our communities, and contribute meaningfully to a sustainable future.