

SUSTAINABILITY 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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1	18 February 2025
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Document Sign-off

	Signed	Date
CEO		18/02/2025

All changes are logged in the Policies Document Control Register.

1. ABOUT THIS POLICY

- 1.1 Brockwell Energy Limited, together with its subsidiaries and affiliates, is committed to sustainable practices that reduce environmental impact and promote a low-carbon future. This Sustainability Policy outlines our standards for responsible resource use, energy efficiency, and environmental protection.
- 1.2 This policy applies to all Brockwell Energy operations, including corporate offices and project sites. It defines our approach to sustainability in project development, resource management, and environmental impact reduction. All employees, officers, consultants, contractors, volunteers, interns, casual workers, and agency workers are expected to comply with this policy.
- 1.3 As a responsible project owner, Brockwell Energy embeds sustainable practices into project planning and site management. While day-to-day operations may be managed by principal contractors, Brockwell Energy ensures that sustainability goals are met through ongoing oversight. Sustainability is an integral part of ethical business practices at Brockwell Energy. This policy should be read alongside our Ethics & Code of Conduct Policy, which sets out our commitment to integrity, accountability, and responsible corporate behaviour.
- 1.4 This policy is not part of any employee's employment contract and may be updated by the Company to reflect advances in sustainable practices and regulatory standards.
- 1.5 This policy aligns with Brockwell Energy's Supply Chain & Procurement Policy, ensuring that sustainability is embedded in responsible sourcing, supplier accountability, and ethical procurement practices

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 Sustainability Policy. The Board is committed to integrating sustainability into Brockwell Energy's business practices, upholding the highest standards of environmental responsibility, ethical governance, and corporate accountability.
- 2.2 All managers are responsible for ensuring compliance with this policy, embedding sustainability principles into day-to-day operations, and ensuring that staff, contractors, and stakeholders uphold Brockwell Energy's commitments to environmental stewardship, ethical conduct, and transparency. Managers must also take corrective action where sustainability standards are not met.
- 2.3 Staff, contractors, and stakeholders are encouraged to report any concerns related to sustainability, environmental impact, or compliance with this policy. Open communication is essential to maintaining a responsible and sustainable business, and 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 sustainability-related practices, should be directed to the Company.
- 2.5 Employees and stakeholders are invited to provide feedback and suggest improvements to this policy to support Brockwell Energy's ongoing commitment to sustainability and continuous improvement.

3. PURPOSE

- 3.1 The Sustainability Policy demonstrates Brockwell Energy's commitment to sustainable practices that reduce environmental impact, promote renewable energy, and support a low-carbon future.

This policy provides a framework for integrating sustainability into all aspects of our business operations, from project planning to execution and beyond.

4. SCOPE

- 4.1 This policy applies to all Brockwell Energy activities, projects, and stakeholders. It outlines our approach to sustainability in project development, resource management, community impact, and energy efficiency.

5. COMMITMENT

- 5.1 Brockwell Energy is committed to advancing sustainability by creating renewable energy solutions that minimise environmental impact and support long-term resilience. Our goal is to contribute positively to the environment while promoting responsible resource use, sustainable growth, and climate action.

6. PRINCIPLES

- 6.1 Our sustainability approach is driven by the following principles:
- **Environmental Responsibility:** We strive to reduce emissions, conserve natural resources, and restore ecological balance in the areas we operate.
 - **Resource Efficiency:** We prioritise efficient use of materials, energy, and water, ensuring that our projects maximise sustainability from the ground up.
 - **Continuous Improvement:** Brockwell Energy continuously evaluates and improves our sustainability practices to adapt to evolving environmental and social standards.

7. IMPLEMENTATION

Renewable Energy Development

- 7.1 Our core focus is the development of renewable energy projects, including onshore wind, solar, and battery storage, to support the transition to a low-carbon energy landscape. Each project is designed to reduce reliance on fossil fuels and lower greenhouse gas emissions.

Sustainable Resource Management

- 7.2 Brockwell Energy is committed to using recycled and sustainable materials wherever possible. Our projects emphasise resource conservation, minimising waste, and utilising energy-efficient practices in all stages of development.
- 7.3 Sustainable resource management also extends to fair labour practices. In alignment with our Anti-Slavery & Human Trafficking Policy, Brockwell Energy ensures that all materials and labour used in our projects are ethically sourced, with zero tolerance for modern slavery or forced labour.

Environmental Impact Mitigation

- 7.4 We conduct detailed environmental impact assessments for every project to identify and minimise potential adverse effects. This includes implementing measures to protect local ecosystems, rehabilitate land, and reduce project footprints on brownfield and previously developed sites.

Community and Ecosystem Enhancement

- 7.5 Sustainability extends beyond our projects to the communities we work with. We support initiatives like habitat restoration, local tree planting, and the establishment of recreational routes to encourage community engagement and ecosystem enhancement.
- 7.6 Our sustainability initiatives complement Brockwell Energy's Corporate Social Responsibility (CSR) commitments by fostering positive community engagement, supporting biodiversity, and promoting environmental education.

Monitoring and Reporting

- 7.7 Brockwell Energy regularly monitors the environmental performance of our projects and reports on key sustainability metrics. This helps us evaluate our impact, set future targets, and ensure alignment with national and global sustainability goals.
- 7.8 Brockwell Energy's sustainability performance is monitored in line with our ESG Policy, ensuring transparency, accountability, and alignment with national and global sustainability reporting frameworks.

8. CONCLUSION

- 8.1 This Sustainability Policy underscores Brockwell Energy's commitment to responsible, resilient, and resource-conscious practices that support environmental and community wellbeing. Our sustainability efforts are integral to building a cleaner, more sustainable energy future for all.