



**FIDRA**  
ENERGY

# 2025 Sustainability Report

Environmental | Social | Governance

April 2026

## Table of Contents

<b>A note from the CEO</b> .....	<b>3</b>
<b>Introduction</b> .....	<b>4</b>
<b>01. Fidra Energy’s approach to embedding sustainability practices and reporting</b> .....	<b>4</b>
1.1 What does sustainability mean to Fidra Energy? .....	4
1.2 Stages of implementation .....	5
1.3 Integrated approach.....	5
1.4 Alignment with existing frameworks.....	5
<b>02. Supply chain activities</b> .....	<b>6</b>
2.1 Establishing supply chain expectations.....	6
2.2 Conducting supply chain due diligence.....	7
<b>03. Environmental activities</b> .....	<b>7</b>
3.1 Environmental priorities .....	7
3.2 Aligning with the EU Taxonomy .....	8
3.3 Understanding our vulnerability to climate risks.....	9
3.4 Thorpe Marsh – protecting the local environment and promoting biodiversity .....	9
<b>04. Social responsibility</b> .....	<b>12</b>
4.1 Stakeholder groups.....	12
4.2 Human rights policies and risk management .....	12
4.3 Our People.....	13
4.3.1 Diverse and inclusive workplace .....	13
4.3.2 Learning & Development.....	14
4.3.3 Employee Wellbeing .....	14
4.3.4 Employee Engagement .....	15
4.3 Health & Safety .....	16
4.4 Working with the local community.....	16
4.5 Corporate social responsibility .....	17
<b>05. Good governance</b> .....	<b>17</b>
<b>06. Plans for 2026</b> .....	<b>18</b>

## A note from the CEO

Fidra Energy was established in 2024 with a simple mission – to acquire, develop, build and operate large energy storage projects. These projects provide critical resilience and flexibility to the UK’s electricity network and enable a more electrified energy system.

Building a sustainable business is at the heart of our strategy from supply chain management through to our site development and construction, and eventually into operations. As the business evolves and grows, we will continue to drive our ESG activities forward, recognising the critical roles our projects have at both national and local level.

Finally, I would like to thank our investors, EIG and the National Wealth Fund, for their contributions to this report and our strategy. By working together and sharing best practice, we will continue to strive for high standards and hold ourselves accountable for performance.

A handwritten signature in black ink, appearing to read 'Chris Elder'.

Chris Elder, CEO

# Introduction

The Fidra Energy Group (the Group or Fidra Energy) acquires, develops, builds and operates large-scale battery energy storage projects in the United Kingdom. Our first battery energy storage project at Thorpe Marsh, Yorkshire, the largest battery storage project in the UK began construction in September 2025 and is expected to become operational in 2027. West Burton C in Nottinghamshire will commence construction in 2026 and is expected to become operational in 2028.

This is our first Sustainability Report and captures key actions taken in 2025 to embed and enhance sustainability across the Group. It covers head office activities and those for our sites, with a particular focus on Thorpe Marsh.

The first section outlines what sustainability means to Fidra Energy and our approach to the ongoing cycle of implementation across the three “ESG” pillars of sustainability - environment, social responsibility and good governance - as both our business and the sustainability landscape evolve over time.

We then highlight the main activities undertaken in 2025, commencing with supply-chain related initiatives that span environmental, social and governance issues, and then capturing key actions under each of the three ESG pillars in the following sections.

The last section sets out key objectives for 2026, during which we will build on our existing activities and establish them in a more formalised sustainability data gathering and reporting structure.

## 01. Fidra Energy’s approach to embedding sustainability practices and reporting

### 1.1 What does sustainability mean to Fidra Energy?

Fidra Energy’s central purpose is enabling energy transition by supporting renewable generation. Our approach to sustainability is shaped around environmental protection, social responsibility and good governance. We work in partnership with key stakeholders to ensure Fidra Energy works sustainably. For us embedding sustainability means:

- Safeguarding the environment,
- Respecting and protecting individuals and human rights,
- Behaving fairly, honestly and transparently,

- Ensuring accountability and responsibility, in our internal activities, in the communities local to our offices and sites, through our commercial relationships and across our supply chain.

## 1.2 Stages of implementation

Fidra Energy’s framework for sustainability performance is based on the following phases:

1. Identification of potential sustainability risks and opportunities;
2. Assessment and prioritisation of options to manage and minimise risks and promote good practice;
3. Actions and initiatives to embed sustainability;
4. Monitoring and reporting on effectiveness of actions; and
5. Reviewing performance and adjusting plans where necessary to foster improvement on an ongoing basis.



## 1.3 Integrated approach

We are committed to ensuring a coherent and consistent approach to embedding sustainability across the Group and communicating our approach clearly to stakeholders from local communities and investors to commercial counterparties and suppliers. While some activities fall under one aspect of sustainability there is frequent interaction and overlap between the three key areas, as reflected in internationally recognised planning and reporting frameworks.

## 1.4 Alignment with existing frameworks

Our approach to sustainability planning and reporting focuses on achieving alignment with recognised frameworks including:

- The Equator Principles;
- The work of the Task Force on Climate-Related Financial Disclosures (TCFD) and resulting International Financial Reporting Standards (IFRS) developed by the International Sustainability Standards Board (ISSB);
- The EU Taxonomy for Sustainable Activities (the EU Taxonomy);
- UN Guiding Principles for Business and Human Rights; and
- The OECD Guidelines for Multinational Enterprises.

This allows us to:

- Draw on the wealth of guidance materials flowing from these initiatives to embed best practice in our activities;
- Meet investor and lender compliance and reporting expectations;
- Benchmark our own performance and progress; and
- Structure our plans to improve on a continuous basis.

For example, our technical and environmental due diligence for the Thorpe Marsh project included an independent review of Fidora's compliance with the Equator Principles.

## 02. Supply chain activities

### 2.1 Establishing supply chain expectations

One of the key actions we took this year was drawing up our Supplier and Supply Chain Principles document, which, in tandem with our Code of Conduct, sets out our expectations of sustainable and responsible business conduct. We expect our own people to comply with the four key sustainability principles of:

- Safeguarding the environment
- Respecting and protecting individuals and human rights
- Behaving fairly honestly and transparently; and
- Ensuring accountability and responsibility

in their daily activities and in selecting suppliers as part of our procurement process. The Supplier and Supply Chain Principles document provides details of the criteria we use to evaluate compliance with those principles and allows us to communicate those expectations clearly to our

suppliers. Compliance with the Supplier and Supply Chain Principles is mandated in our standard terms and conditions for purchasing goods and services and informs our approach to contracting.

## 2.2 Conducting supply chain due diligence

We conduct a level of supplier due diligence on all material suppliers based on a risk assessment. For example, as part of the procurement process for appointing our preferred battery supplier for Thorpe Marsh, Sungrow, we commissioned an independent adviser, Infyos, to conduct an enhanced ESG due diligence exercise. The assessment covered 24 ESG factors, with a particular focus on human rights considerations, given the risks identified in connection with the sourcing of raw materials and manufacturing of batteries. No areas of high risk were identified and Sungrow was identified as performing favourably in comparison with competitors.

We are committed to working in partnership with Sungrow throughout the contract lifecycle to make further improvements, refreshing our due diligence on an ongoing basis and working to achieve greater transparency, including in relation to Sungrow's own supply chain.

In addition to the independent supply chain due diligence assessment, Infyos provides an ongoing media monitoring service, allowing us to identify any new suspected incidents or risks relating to ESG performance and respond accordingly.

# 03. Environmental activities

## 3.1 Environmental priorities

Enabling energy transition is at the heart of our business. Batteries themselves have a low operational emissions footprint, so our environmental activities for each of our projects focus on:

- Driving circularity - battery recycling is built into project costs and contracts;
- Promoting biodiversity net gain; and
- Understanding and guarding against climate risks.

We are committed to meeting the environmental obligations enshrined in permits and planning permissions, and to continue identifying opportunities to improve environmental performance over time. We have been considering emissions calculation methodologies and will begin providing emissions figures in our next Sustainability report.

## 3.2 Aligning with the EU Taxonomy

One of the key activities we undertook this year was ensuring that Fidra Energy’s activities are aligned with the EU Taxonomy Regulation.<sup>1</sup> We commissioned Ramboll to review our existing activities and their report was delivered in January 2025. The report found that the business was already aligned with the Taxonomy in many respects and identified areas where further work was needed to meet the criteria. In response to this assessment, we undertook actions including:

- Updating and establishing policies and procedures to reflect Taxonomy requirements; and
- Commissioning Climate Exposure Analysis or Climate Vulnerability Risk Assessments (CVRAs) for each of our sites.<sup>2</sup>

The table below provides an overview of Fidra’s work to align with the EU Taxonomy technical screening criteria during 2025.

Contribution to an Environmental Objective (Climate Change Mitigation)	Compliance with Do No Significant Harm (DNSH) Criteria			Good Governance Practices
EU Taxonomy-eligible technologies (Taxonomy Pathway) and/or clear evidence of one of the three following indicators: reduced, avoided, or removed GHG emissions (Sustainability Indicator Pathway).	Ensuring all DNSH* criteria are fulfilled			Evidence of good governance practices includes evaluation of management structures, employee relations, remuneration, and tax compliance based on the OECD Guidelines for MNEs and UNGPs
EU Taxonomy Pathway: Climate Change Mitigation  ✓ 4.10 – Storage of Electricity	<i>Climate Change Adaptation</i>  <b>Fulfilled</b>  ✓ Physical risk screening ✓ Climate risk and vulnerability assessment ✓ Implementation of adaptation measures	<i>Transition to a Circular Economy</i>  <b>Fulfilled</b>  ✓ Contractual obligation on supplier to recycle batteries at end of life	<i>Protection and Restoration of Biodiversity and Ecosystems</i>  <b>Fulfilled</b>  ✓ EIA screening in accordance with law ✓ EIA mitigation and compensation measures ✓ Biodiversity sensitive areas assessments	<b>Fulfilled</b>  ✓ Human rights due diligence aligned with applicable frameworks ✓ Anti-corruption and bribery processes ✓ Fair competition practices ✓ Taxation process and oversight

\*Sustainable Use and Protection of Water and Marine Resources and Pollution Prevention and Control are not applicable to Fidra Energy’s projects

<sup>1</sup> Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 - [Regulation - 2020/852 - EN - taxonomy regulation - EUR-Lex](#)

<sup>2</sup> The CEA is the first stage of a CVRA. Fidra’s policy is to conduct CEAs to evaluate potential development sites. Full CVRAs maybe conducted in advance of acquisition or at the detailed project planning stage where the more extensive assessment delivers most value. This is because proposed risk mitigation measures can be tailored to and captured within, this detailed project plan.

### 3.3 Understanding our vulnerability to climate risks

CVRA's are used to evaluate a broad range of potential risks including land contamination, flood risk, permitting, noise, and pollution prevention. Fidra commissioned Ramboll to conduct CVRA's consistent with the EU Taxonomy technical screening criteria for both Thorpe Marsh and West Burton C: no material risks were identified for either project.

We also commissioned a Climate Exposure Analysis (CEA) for Bicker Fen (a further large battery site under development by Fidra in Lincolnshire), to be expanded to a full CVRA ahead of final investment decision.

### 3.4 Thorpe Marsh – protecting the local environment and promoting biodiversity

#### 3.4.1 Environmental responsibility

Environmental responsibility is embedded in the design for Thorpe Marsh.

For example, the underground drainage system for the site channels water from the battery arrays and substation area into three attenuation ponds, through which water flows before rejoining the local river. There is a mechanism, which means that water outflow from the attenuation ponds to the local water course is automatically stopped in the unlikely event that the water is contaminated.

#### 3.4.2 Promoting biodiversity

Fidra is committed to promoting biodiversity net gain: some examples of actions at Thorpe are below.

The weed in the coal stocking yard(pond) is New Zealand pigmyweed, Latin name *Crassula Helmsii*. This is an invasive aquatic plant, that had spread to cover most of the coal stocking yards pond areas starving the water of sunlight and oxygen. The weed was removed in during Sept 2025 by mechanical harvesting of the weed and placing in a quarantined area before treatment with herbicide and natural drying. The clearing of the pond has resulted in the pond being able to naturally reoxygenate and allowing notable increases and establishment of wading and aquatic bird life across the pond and its margins.

The attenuation ponds will be grass seeded and provide areas for wildlife. In addition, saline ponds have been constructed to encourage invertebrates and wildlife to inhabit, and multiple wildlife enhancement habitats have been created within the overall site area, but outside of the operational areas using felled trees and brush.



*Figures 1 & 2: Saline seepage ponds*

*Figures 3 & 4: Trees, shrubbery and topsoil that have been crafted into an inhabitable place for wildlife*



Birdlife in and around the site includes herons, egrets, redpoll, and woodpeckers. The site has also been developed to preserve a wooded area, home to a set of badgers, which is located outside the operational area of the BESS facility.



*Figures 5 & 6: A Gabion Wall, which allows for animals such as birds to make nests in the gaps in between the rocks.*

We have also recycled original construction material retained on site from the original site usage and recycled aggregates for finished surfaces road and hard standing surfaces.

As we have entered the construction phase, further opportunities to embed environmental responsibility have been identified and acted upon – for example, we translocated 21 oak trees during development of the project.



*Figure 7: Tree that was removed and replanted: the buds on the branches indicate that the relocation has been successful.*

## 04. Social responsibility

### 4.1 Stakeholder groups

Our social sustainability activities focus on our responsibilities to four key stakeholder groups:

- Fidra’s own employees, agency workers and contractors;
- Site workers (contractors and sub-contractors) involved in Fidra’s construction and development projects;
- Individuals impacted by Fidra’s supply chain (both those working for companies along the value chain and the local communities impacted by their activities); and
- Local communities in the places where Fidra has offices/operations.

Our focus is on establishing strong foundations that support our people, communities, and wider stakeholders.

### 4.2 Human rights policies and risk management

In 2025 we reviewed our Human Rights Policy and Human Rights Impact Assessment documentation, introducing a more structured approach with a new risk matrix to capture key findings of the impact assessment, monitor ongoing compliance, capture actions taken to strengthen our approach to protecting human rights and identify steps for the future.

This year we reviewed and refreshed our human rights policy and human rights impact assessment (HRIA), introducing a more structured approach to human rights risk management.

Key changes to the HRIA included:

- Expanding on sources informing our understanding of human rights requirements and identifying rights potentially impacted by Fidra’s business;
- Incorporating key findings from the final version of the Supplier ESG Due Diligence Assessment Report received from Infyos and identifying next steps to continue building on this work; and
- Introduction of a human rights tracking matrix broken down by key stakeholder groupings assigning key performance indicators (KPIs) to assess human rights performance against potential risks.

We are working to ensure that we align with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct and comply with our obligations under the UK Modern Slavery Act 2015.

As such, we have already begun producing an annual Modern Slavery Statement, aligned with our human rights policy and risk management framework. Our most recent statement is available on our website and is reviewed on an annual basis. We will continue to expand the statement in line with the Home Office statutory guidance on Transparency in Supply Chains.

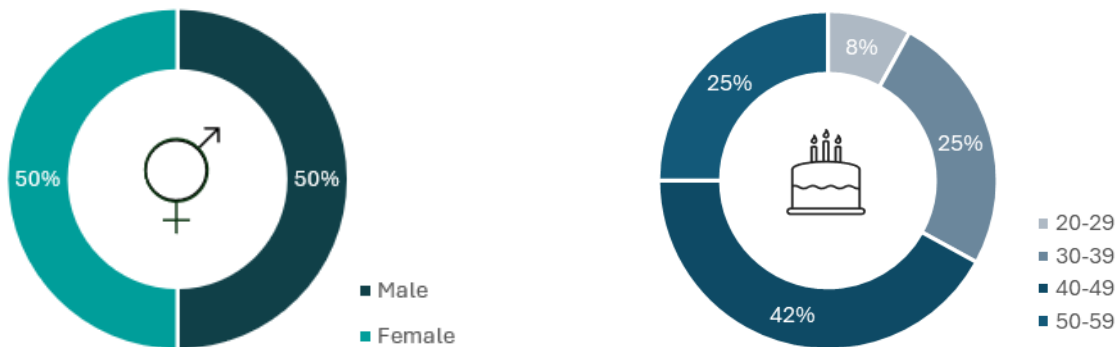
## 4.3 Our People

### 4.3.1 Diverse and inclusive workplace

We are committed to providing a fair, inclusive, and respectful working environment. This year we reviewed our people policies and workforce data to understand diversity across the organisation and next year we will look to identify opportunities for improvement.

Our team is small but we have a good spread of both age and gender demographics. Our executive team has three men and two women.

***Fidra Energy's gender demographics as at 31 December 2025***      ***Fidra Energy's age demographics as at 31 December 2025***



Our aim during 2025 was to focus on building awareness around diversity and inclusion. We rolled out compulsory training on Equality, Diversity & Inclusion, Disability Awareness and Modern Slavery, Sexual Harassment and Human Trafficking.

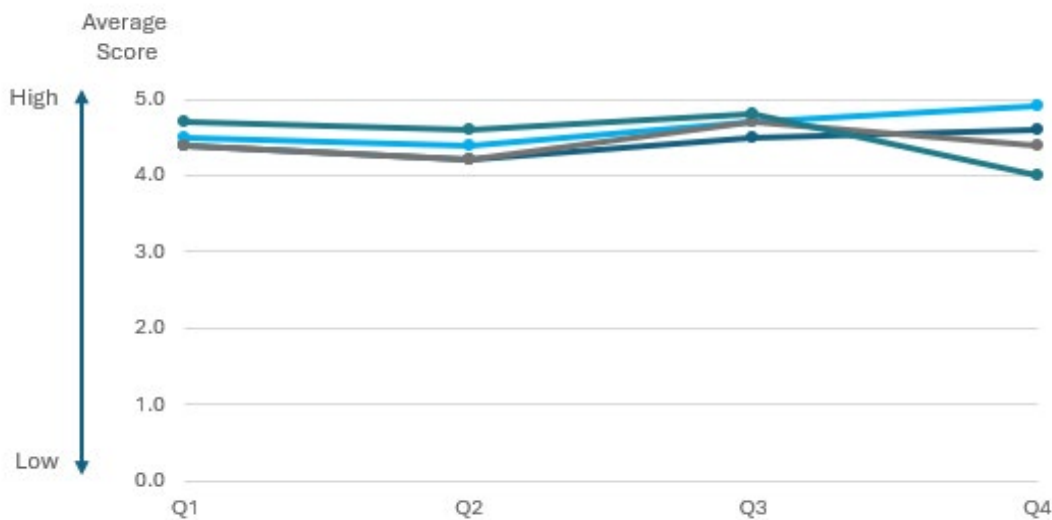
### 4.3.2 Learning & Development

We support continuous learning and are strengthening our training and development framework to ensure employees have access to relevant skills development and career progression opportunities.

### 4.3.3 Employee Wellbeing

We recognise the importance of employee wellbeing and as such we issue employee wellbeing surveys on a quarterly basis to give us a pulse check on our employees' emotional wellbeing. We measure employee wellbeing by asking questions in four categories, Happiness, Relationships, Personal Motivators and Company Motivators. The Employee Wellbeing report focuses more on the responses from our employees, providing a score among each of the four categories so we can quickly see where there is room for improvement (with the opportunity for employees to provide suggestions) and where our company is excelling at meeting our employee's needs.

#### Fidra Energy Wellbeing Survey Monitoring - Quarterly 2025



**Key:**

- Happiness**  
*I am enthusiastic about my job*
- Personal Motivators**  
*It's clear to me how my role contributes to the success of the company*
- Company Motivators**  
*I feel comfortable providing feedback to my supervisor*
- Relationships**  
*I have positive relationships at work*

### 4.3.4 Employee Engagement

We issue an employee engagement survey every 6 months. We achieved an Employee Net Promoter Score (eNPS) of 80 in the September 2025 survey, an increase of 30 since the previous survey in March. Our average response rate for the survey was 91.5%. As with the wellbeing survey, there are opportunities to provide suggestions to support ongoing improvement.

Some key themes stood out as reasons why our people enjoy working at Fidra:

- ✓ **Team excellence and talent**  
Recognising the skills and collaboration across the business
- ✓ **Unified goals and support**  
Clarity of direction and encouragement from colleagues and leaders
- ✓ **Work variety and fun environment**  
Enjoying a dynamic workplace with opportunities to learn
- ✓ **Workplace culture and social connections**  
The sense of belonging and camaraderie
- ✓ **Ambition and achievement**  
Being part of a company that strives for success

Small team camaraderie was identified as an area for improvement.

**Small team camaraderie**  
Ensuring collaboration remains strong, even in smaller groups, be clear who is working on what”

In response to this, we introduced 15-20 minute weekly all-employee “stand-up” meetings, providing an opportunity to hear what every employee is working on.

### 4.3 Health & Safety

We ensure that our contractors have good safety procedures and foster a responsible culture on site, with a dedicated independent HSE specialist in place.

Fidra monitors health and safety performance during construction. The figures for Thorpe Marsh, construction of which commenced in 2025, are set out below. This focuses on lost time incidents, first aid incidents and environmental breaches.

Indicator	September	October	November	December
Lost time Incidents (LTI)	0	0	0	0
First Aid Incidents	0	2	0	0
Environmental breaches	0	0	0	0

The Fidra executive team participated in a dedicated health and safety training on 19 August 2025. All other employees completed DSE Awareness, Fire Awareness and Fire Warden training in 2025.

### 4.4 Working with the local community

Our contractors are already working with the local community at the Thorpe Marsh development site in a number of ways, including:

- contracting with local businesses in support of the construction of the project for material supply and provision of services including pulverised fuel ash testing and security services;
- creating local jobs - two team members were recruited from within 10 miles of the project but this is expected to increase significantly as recruitment for operational roles commenced in Q4 2025;
- creating two trainee positions within the construction director’s team, also supporting them to attend Lincoln college;<sup>3</sup>
- working with Doncaster College to provide courses for the team; and
- supporting the Yorkshire Wildlife Trust;

<sup>3</sup> Students attend Lincoln college as the course is not available in Doncaster

In addition, but harder to measure, there are general economic benefits of the project to the surrounding area from utilising local shops, hotels and other facilities.

We are also setting up a Community Benefit fund in 2026 to provide ongoing funding for local projects. We will work closely with the local authorities and parish councils around the site to ensure this is distributed fairly amongst local projects, maximising the benefits to local communities.

## 4.5 Corporate social responsibility

In November 2025, we chose donation to Crisis Edinburgh to combat homelessness in our head office's local community. The charity plays a vital role tackling homelessness at its root and helping individuals rebuild their lives with dignity and stability.

Through services such as Crisis Skylight Edinburgh, the charity provides practical support including help with housing, employment, education, mental health, and wellbeing, offering people a real pathway out of homelessness rather than just temporary relief. In a city where rising living costs and housing shortages put many at risk, Crisis works closely with local partners and communities to prevent homelessness before it happens and to ensure those already affected are not left behind. For the people of Edinburgh, Crisis represents hope, compassion, and long-term change, helping to create a fairer city where everyone has a safe place to call home.

# 05. Good governance

During 2025 we strengthened organisational governance and compliance mechanisms.

- With the restructuring of the Group, we introduced a **new Board Terms of Reference**, which sets key expectations in relation to governance, including establishing a list of Board policies to be reviewed on an annual basis and adding ESG to the list of standing items on the Board agenda.
- We **continued developing our policies and procedures** – both reviewing existing materials and creating new ones to ensure we deliver on our legal, regulatory and ethical obligations. For example, we introduced the following:
  - Anti Money Laundering Policy;
  - Sanctions Policy;
  - Document Control Policy; and our
  - High Risk Travel Procedure.

- The **Executive team undertook training** covering critical risk topics, including corporate criminal responsibility and health & safety.
- We **introduced a new Core Training programme for staff** to make sure everyone understands their obligations. Throughout 2025 our employees completed a total of 74 hrs of core training. The programme will be expanded over time, but already covers a wide range of topics including:
  - Equality, Diversity & Inclusion;
  - Disability Awareness & Inclusion;
  - Sexual harassment;
  - Modern Slavery;
  - Fraud Prevention;
  - Anti-Bribery;
  - Anti-Tax Evasion;
  - Cybersecurity.
- We obtained the **Cyber Essentials accreditation**.
- We **developed a comprehensive IT and operating technology strategy** for Thorpe Marsh.

## 06. Plans for 2026

Over the course of 2026 we will continue with our existing activities and expand our sustainability programme as follows:

- Establishing clear sustainability KPIs and defining metrics and methodologies to measures, analyse, benchmark and report on our progress with reference to international and domestic frameworks;
- Commencing reporting on Scope 1, 2 and 3 emissions;
- Develop our biodiversity net gain plan for West Burton C;
- Working with key suppliers to improve ESG performance;
- Prepare and execute a local stakeholder engagement plan for West Burton C;
- Distribution of Thorpe Marsh community benefit fund as agreed with local stakeholders
- Increasing direct employment by Fidra (22 people = 16 for Thorpe Marsh and 6 for West Burton C) plus H&MV local hires etc (estimated to be 100+ during construction phase) in the interim;

- Continuing building out our suite of operational policies and procedures in advance of commissioning, including those relating to health and safety
- Progressing towards achieving relevant technical standards, including:
  - Developing an Integrated Management System aligned with ISO 9001 (Quality Management), ISO 14001 (Environmental Management), and ISO 45001 (Health & Safety Management); and
  - Working towards embedding the Cyber Assessment Framework (CAF) using the overlay for downstream gas and electricity sector to establish compliance with the NIS Regulations, with the aim of achieving Cyber Essential Plus and ISO 27001 accreditations.

Our progress will be captured in a fuller sustainability report at the end of 2026.

*April 2026*