GLID WIND FARMS TOPCO LIMITED

Sustainability Policy

(Environmental, Social and Governance policy suite)

1st November 2025

GLID Wind Farms TopCo Limited ("GLID") is a UK Green Investment Group/ MGREF2 /METI Joint Venture

MACQUARIE | Green Investment Group

GLID Harnessing natural energy

GLID WIND FARMS TOPCO LIMITED
SUSTAINABILITY POLICY

1. Introduction

GLID has always had sustainability at the core of its business and strategy. This includes minimising environmental impact, supporting biodiversity, promoting circular economy principles, and contributing to the UK's Net Zero goals. Sustainability continues to be a top priority alongside Health and Safety throughout the entirety of its operations.

1.1. Glossary and Definitions

GLID	GLID WIND FARMS TOPCO LIMITED
Service Provider	Siemens Gamesa Renewable Energy Ltd
Owners' Representative	XceCo Limited
ESG	Environmental, Social & Governance
GHG	Green House Gases
GRI	Global Reporting Initiative

2. Policy, organisation, and arrangements

2.1 Sustainability Policy

The Board of Directors has ultimate responsibility for ESG performance and is committed to the achievement of excellence in all environmental, social and governance areas.

At its core, sustainability is all about not permanently consuming resources from the planet for today, at the expense of those resources' availability for the people of tomorrow.

The following principles will be incorporated into the operational decision-making process of GLID:

- Consider material ESG issues to mitigate potential risks
- Monitor any ESG issues that are considered material to the operations and performance of the Company using specific ESG metrics
- Develop appropriate measurement indicators and other reports to provide oversight of the Company's ESG performance

2.2.1 Environment

GLID will achieve environmental goals through their commitment to: -

- Comply with all relevant legislation, regulations and ESG related policies,

- Regularly review the environmental impact of its activities, endeavour to reduce its overall environmental impact, prevent waste and reduce emissions using best practice techniques,

- Drive change towards a Zero Emissions target split into phases whereby GLID achieves Zero GHG emissions specifically for Scope 1 and Scope 2 Market Based emissions by 2025 and Net Zero GHG Emissions for all scopes by 2040; by actively incorporating sustainability within supply chain decisions to limit Scope 3 emissions whilst also expanding our boundaries on Scope 3 inventory recording to realise our full impact on the environment,

- Manage the lifecycle of the asset by exploring lifetime extension options to reduce waste and maximise value, plan for responsible decommissioning and material recovery and explore design options for longevity and repowering potential,

- Involve relevant stakeholders / personnel in the environmental programme and provide necessary training to enable them to deliver on their responsibilities,

- Sustaining a programme of continual improvement in environmental performance incorporating suitable measurement and monitoring mechanisms,

- Work with key suppliers to encourage them to develop environmental best practice see Code of Conduct: XL-GLID-3-PP-0016),

- Improve resource efficiency (including use of water, energy, and raw materials),

- Prevent and/or limit the discharge of pollutants to water, land, and air,

- Reduce and/or limit the withdrawal of water from all sources,

- Limit the operational noise and light in and around the site, and

- Segregate and recycle waste where possible.

2.2.2 Social

We will achieve a high level of social sustainability through our commitment to: -

- Provide safe and healthy working conditions for all, promoting diversity, equality and inclusion and ensuring all personnel and contractors are treated fairly (see Labour Standards Policy: XL-GLID-3-PP-0010 and Equality, Diversity & Inclusion Policy: XL-GLID-3-PP-0007) whilst upholding high standards of business integrity in all dealings.

- Be honest, clear and transparent in all forms of communication with personnel, counterparties, suppliers, customers, community stakeholders, regulators, lenders and shareholders. We aim to maintain and build on this with personnel in accordance with relevant policies to ensure effective training, development and management.

- Actively seek to understand the impact of our decisions on others. For example, seek feedback and give a voice to all staff, foster strong communication and consider the impact of any operations on local communities, stakeholders and the environment (see Employee Engagement Policy: XL-GLID-3-PP-0011 and Stakeholder Relations Policy: XL-GLID-3-PP-0012).

- Have a zero-tolerance approach to modern slavery and commit to acting ethically and with integrity in all business dealings and relationships. To implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in the business or supply chains (see Modern Slavery Statement: GLID | Harnessing Natural Energy (glidwindfarms.com) and Anti-Bribery and Anti-Corruption Policy: XL-GLID-3-PP-0001).

- Ensure there is transparency in the business and in the approach to tackling modern slavery throughout the work at site and all associated supply chains, consistent with disclosure obligations under the Modern Slavery Act 2015. The same high standards are expected from

all contractors, suppliers, and other business partners, and it is expected that suppliers will hold their suppliers to the same high standards.

- Enhance the lives of people living in the local community by encouraging effective and sustainable participation in its own development and by supporting local initiatives in various ways (see Community Development Policy: XL-GLID-3-PP-0005).

2.2.3 Governance

GLID will achieve a high quality of governance with commitment to: -

- Conduct all business in an honest and ethical manner. Any suspected wrongdoing should be reported as soon as possible as per the Whistleblowing Policy (XL-GLID-3-PP-0009).

- Take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all business dealings and relationships while implementing and enforcing effective systems to counter bribery and corruption (see Anti-Bribery and Anti-Corruption Policy: XL-GLID-3-PP-0001).

- Conform, as far as is reasonably practicable, with the latest guidance from the National Cyber Security Centre (NCSC) in the UK to protect data and preserve IT infrastructure (see Cyber Security Policy: XL-GLID-3-PP-0006). Personal data is handled in accordance with the Data Retention Policy: XL-GLID-3-PP-0018 which sets out the minimum standards to be applied when destroying certain information.

- Comply with the Money Laundering Regulations and have appropriate systems and controls in place to prevent money laundering and terrorist financing (see Anti-Money Laundering Policy: XL-GLID-3-PP-0014).

- Reduce the sensitivity of the risk to physical assets, increasing its adaptive capacity and planning to increase the resilience of the built environment against physical risks, climate-driven or otherwise. Risks are managed via a Risk Register which is reviewed regularly (see Physical Risk Policy: XL-GLID-3-PP-0013).

2.2.4 Global Reporting Initiative (GRI) Standards

GLID will use the Global Reporting Initiative (GRI) Standards for Sustainability reporting purposes. The GRI Standards represent global best practice for reporting publicly on a range of economic, environmental, and social impacts. Sustainability reporting based on the Standards provides information about an organisation's positive or negative contributions to sustainable development.

2.2.5 Organisation and Arrangements

We will endeavour to ensure that sustainability goals are managed via supply chain contracts. The Service Provider and the Owners' Representative shall detail the organisational arrangements for executing this policy within the service provider's business management system.

3. Review

The policy shall be reviewed on a regular basis by GLID's board of directors.

4. References

4.1. Legislative Requirements and Guidance

Food and Environment Protection Act 1985
Environmental Protection Act 1990
Water Resources Act 1991
Clean Air Act 1993
Marine and Coastal Access Act 2009
The Waste (England and Wales) Regulations 2011
Environment Act 1995 - Part V Waste
The Merchant Shipping (Oil Pollution Preparedness, Response and Co-operation Convention) Regulations 1998
Modern Slavery Act 2015
Transparency in Supply Chains Act 2010
The United Nations Convention on the Rights of the Child (UNCRC)
International Labour Organization (ILO) Conventions No 138 (Minimum Age) and No 182 (Worst Forms of Child Labour)
The Children's Rights and Business Principles (UNICEF)
Education Act 1996
Equality Act 2010
Protection from Harassment Act 1997
Social Accountability International SA8000 Standard 2014
Universal Declaration of Human Rights
European Convention Human Rights
International Labour Organization (ILO) Conventions
Human Rights Act 1998
Data Protection Act 2018
Bribery Act 2010
Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
Proceeds of Crime Act 2002
Terrorism Act 2000
UK Energy Act 2023 – Environmental Improvement Package (OWEIP)
Marine Strategy Framework Directive
Habitat Regulations Assessment (HRA)
Natural England's Best Practice Advice for Offshore Wind
The Crown Estate's Sustainable Seabed Management Principles