

2022

Environmental, Social and Governance Report



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A message from our CEO

Welcome to West Burton Energy's first Environmental, Social and Governance (ESG) report. I am extremely excited that we are able to outline our approach to ESG and capture all the ongoing efforts we're making to be more sustainable, responsible and resilient; helping to keep the lights on in the UK.

At West Burton Energy, we play a key role in the UK's energy transition. We are committed to providing flexible and reliable power to support a secure and stable supply now and in the future, generating electricity from one of the most modern and efficient gas plants in the UK and storing or discharging power through our industry leading battery storage project at the West Burton site.

We place great value on supporting the local economy and are pleased to be able to provide highly skilled jobs in North Nottinghamshire and further afield through our supply chain. I was extremely proud that last year we sponsored the Bounce Back Award at the North Notts Business Awards reflecting the heroic efforts that many local businesses

have made to overcome the challenges of the COVID pandemic and the ongoing cost of living crisis.

Now, more than ever, it is important that we take proactive steps to ensure that our approach to sustainability is transparent, forward-thinking, and achievable. This report acts as our commitment on how we will behave as a neighbour, an employer and an energy generator in an ever-changing marketplace.

Finally, it is truly our people at West Burton Energy who have been the drivers in developing this ESG report and our decarbonisation strategy by assessing and constantly improving ways in which we deliver against our key business objectives. I am proud of them and proud of our business.

Chris Elder
CEO of West Burton Energy



02 Introduction

About West Burton Energy

Established in 2021, we are an independent power producer based in the UK, committed to playing a crucial role in keeping the lights on throughout the UK's energy transition towards net zero and beyond.

At West Burton Energy, we believe that everyone should have access to stable and reliable electricity, which gives meaning to everything we do.

Our operating asset is West Burton B which comprises a modern, highly flexible and efficient Combined Cycle Gas Turbine (CCGT) Power Plant commissioned in 2013 and a battery storage (BESS) facility commissioned in 2018 located near Retford, Nottinghamshire. Together, these technologies provide on-demand energy products which are fundamental in supporting the UK's changing grid landscape and fuelling the transition to a low carbon future.

The CCGT Power Plant comprises three individual units with a combined output of 1333MW which is enough electricity to power 1.5 million homes. The BESS facility can import or export up to 49MW and can also provide a range of services to the operator of the National Grid to maintain the frequency and voltage of the wider UK transmission system.

Our core mission is to produce and store safe, reliable and flexible electricity to power homes and businesses in the UK and this is only made possible through the hard work of our employees and contract staff. We have a people-centric business model and place great importance on ensuring that our people are valued, respected and safe at all times at West Burton Energy.



CCGT output 1333MW,
powering 1.5m homes





02 Introduction

History of West Burton B

West Burton B CCGT was originally commissioned in 2013 and built by the site's previous owners, EDF. We are extremely proud that approximately 70% of our current on-site team were involved in the building and commissioning of the power plant, as well as being a part of its successful, commercial operation.

The addition of our 49MW BESS, which was commissioned in 2018, was an important milestone for us at West Burton Energy, as we began to invest in low carbon, battery storage assets. The West Burton BESS provides almost instantaneous response services to National Grid which helps to operate the UK electricity transmission network safely and reliably.

The future of West Burton Energy

We are excited about the future of West Burton Energy as we continue to grow as a business and expand our portfolio of flexible, low carbon assets.

As part of our ambitious growth strategy, we have plans to triple the size of the business in the next three to five years, which will help us achieve our vision of operating a 5GW+ portfolio of low carbon and storage assets by 2030.

With the UK government's commitment to net zero carbon emissions by 2050 at the forefront of everybody's minds, we are investing in developing additional battery storage facilities at the West Burton site.

In December 2022, we submitted plans for West Burton C, a new 500MW BESS, which will be built on brownfield land on our existing site in Nottinghamshire. If approved, West Burton C BESS could become operational by 2027, with a lifespan of up to 50 years.

As part of our decarbonisation strategy, we are investigating phased hydrogen and natural gas co-fuelling and/or carbon capture technology as a means of abating our carbon emissions from the CCGT power plant.



03 Our sustainability



Our contribution to a sustainable future

People, planet and future are three key areas that motivate us every day as we focus on generating reliable and stable electricity, whilst also ensuring the security of supply for generations to come.

We are committed to supporting the UK energy transition through developing, constructing, operating and maintaining flexible and reliable electricity generation and storage facilities in a safe and efficient manner.

Our vision

To be a developer and operator of a 5GW+ portfolio of low carbon electricity generation and storage assets by 2030.

Our mission

To produce and store safe, reliable and flexible low carbon electricity.

About this report

At West Burton Energy, we are dedicated to enhancing the sustainability of our business and our operations. We have therefore identified key areas that are critical in providing us with a clear pathway to becoming a more sustainable business for our people, stakeholders and local community.

In this report, we disclose data on our ESG performance for 2022, and outline our current activities, initiatives and commitments in a wide range of sustainability topics that we believe are the most pertinent to our business model.

We have shaped our ESG report around the following 14 material aspects covering crucial areas in environment, social and governance.

Our key ESG focus areas

Environment	1.	Air Quality
	2.	Greenhouse Gas Emissions
	3.	Biodiversity and Ecological Impacts
	4.	Water and Wastewater
	5.	Energy Management
Social	6.	Employee Engagement, Diversity and Inclusion
	7.	Human Rights and Community Relations
	8.	Labour Practices
	9.	Workforce Health and Safety
Governance	10.	Business Ethics
	11.	Business Model Resiliency
	12.	Supply Chain Management
	13.	Management of the Legal and Regulatory Framework
	14.	Critical Incident Risk Management



03 Our sustainability

As this is our first ESG report, we will use this as a baseline for reporting across all ESG topics and to identify any areas for improvement in the years to come. This will assist in the development of our ESG strategy to become a more sustainable, resilient and agile business.

Our contribution to sustainable development

The United Nations' Sustainable Development Goals (SDGs) set out 17 ambitious goals underpinned by 169 targets which aim to protect the planet, encourage sustainable economic growth, end poverty and achieve equality for all by 2030. West Burton Energy, like any business, plays a crucial part in contributing to this progress.

We have analysed the SDGs and identified five priority areas that matter the most to our business. We recognise that the sustainability of our business is becoming increasingly important to our stakeholders, and we aim to contribute to the SDGs in the most meaningful and transparent way possible.



Our alignment with the United Nations' Sustainable Development Goals



Goal 3 Good health and wellbeing

The health and safety of our people is our main priority at West Burton Energy and is integral in our day-to-day operations. We have robust health and safety measures in place to protect the health of our workforce and community. We also have an extensive wellbeing programme, including mental health first aiders on hand, to ensure our people always feel supported.



Goal 7 Affordable and clean energy

We are committed to playing a crucial role in keeping the lights on throughout the UK's energy transition through the supply of reliable and flexible energy. We are committed to improving our energy efficiency and investing in innovative, low carbon technologies, such as hydrogen and battery storage solutions.



Goal 8 Decent work and economic growth

Our people are at the heart of everything we do. We play a key role in providing rewarding, well-paid jobs on-site and in our offices across the UK and ensuring a positive contribution to the economic development around our Nottinghamshire site.



Goal 12 Responsible consumption and production

At West Burton Energy, we take our impact on the planet seriously. We work to ensure that we consume any resources we use in the most sustainable way possible, both in our onsite operations and in our supply chains. We are always looking at the latest, innovative techniques in the power industry to enhance our efficiency.



Goal 13 Climate action

Given our role in the energy industry, we recognise that we have an important role to play in reducing our greenhouse gas emissions, which contribute to climate change. Our investment in low carbon technologies, such as hydrogen and battery storage solutions, will enable us to reduce our carbon footprint and be at the forefront of providing flexible, reliable, low carbon energy.

We also believe our actions can contribute to, albeit to a lesser extent, the following goals:

Goal 4
Quality education

Goal 9
Industry innovation
and infrastructure

Goal 10
Reduced inequalities

Goal 11
Sustainable cities and communities



04 Managing our impact on the environment



Our approach to environment

At West Burton Energy, we are committed to managing our impact on the environment by taking proactive steps to reduce our carbon footprint, improve our energy efficiency, grow our portfolio of low carbon assets and protect biodiversity surrounding our site in Nottinghamshire.

While modern, efficient gas-fired power stations, like West Burton B, have played an important role in reducing emissions from the era of coal-fired generation, they can do more as a transition fuel, supporting the required flexibility of a power system that is moving more towards renewables. With the emergence of carbon capture, battery storage technologies and hydrogen solutions, West Burton B can help the UK both keep the lights on and move towards a low carbon economy.



Greenhouse gas emissions

The climate crisis is a key concern for us all and we are aware that the power industry generates a large proportion of the world's greenhouse gas (GHG) emissions.

As a responsible power producer, we recognise that we have an important role to play in reducing our GHG emissions, whilst also providing reliable power to UK consumers and supporting the operation of the national transmission system.

At West Burton Energy, we are taking proactive measures to reduce our carbon footprint by examining opportunities to buy or build flexible low carbon assets such as battery storage, pursuing development of carbon abatement technologies for our existing plant including hydrogen and carbon capture, and adopting measures to improve the efficiency of our existing operations. The majority of our GHG emissions come from our

on-site plant operations. West Burton B is a highly flexible and efficient Combined Cycle Gas Turbine (CCGT) Plant, which produces significantly less carbon emissions than equivalent coal-fired power plants and achieves higher levels of fuel efficiency than traditional gas turbines.

Managing our GHG emissions is important to us at West Burton Energy as it provides us with a baseline to build upon in the coming years. We have accurate monitoring equipment installed on site to track our emissions. By recording our on-site emissions, we are fulfilling the requirements of our GHG Permit provided by the Environment Agency. This has enabled us to measure and report our direct (scope 1) GHG and methane emissions.

Scope 1 emissions

Emission	Unit	2022	2021
CO ₂ e scope 1	Metric tonnes	2,349,580	1,809,884
Methane scope 1	Metric tonnes	168	130

We have also successfully maintained a steady rate of CO₂ emissions per MWh from our West Burton B site, despite the expectation of reduced efficiency throughout the lifetime of West Burton B CCGT. The consistency of our rate of CO₂ emissions is testament to the measures we have in place to ensure our operations are as efficient as possible.





Encouraging sustainability on site

We believe that taking small steps to reduce our overall carbon footprint on site can make a big difference.

At West Burton Energy, we are always looking at ways to enhance our environmental sustainability on site. As such, we recently reduced the number of diesel vehicles on-site by a third and replaced them with three electric vehicles.

We also have four EV charging points on site, with the aim of encouraging our employees and contracted staff to drive their electric vehicles to work, with the option to charge vehicles on site. We are thrilled that our EV scheme is now available to all employees.

There has been a high demand for EV charging points in the past year, which has led us to increase

our capacity to 20 charging points, which will be ready to use by May 2023. In addition, we are pleased to report that our visitor centre and outage building are powered by solar panels, which generated 48.7MWh in 2022. The installation of these panels highlights our commitment to reducing our carbon footprint on site wherever possible.

Decreasing on-site diesel vehicles from 6 to 2, and increasing electric vehicles to 3



Increasing EV charging points



Solar panels, generated 48.7MWh in 2022





04 Managing our impact on the environment

Air quality

In line with best practice and compliance with the law, we also track and manage our air emissions, with the aim of minimising risks to our surrounding communities and environment.

Air emissions of significance

Emission	Unit	2022	2021
NOx	Metric tonnes	1,181	951
SOx	Metric tonnes	9	7
VOC	Metric tonnes	41	32
PM10	Metric tonnes	0	0

The proximity of West Burton A, a nearby coal-fired power station operated by EDF, to our site affects our ability to track air quality pertaining directly to West Burton B. As a result, we engaged with West Burton A in 2022 as required and are committed to working together to improve overall air quality in the area.





Case Study

Hydrogen

As part of our expansion of low carbon assets, we will investigate the feasibility of developing our own integrated hydrogen-fuelled power generation and hydrogen production platform.

We have exciting plans to develop a portfolio of highly flexible, low carbon hydrogen-fuelled peaking plants to generate power quickly and efficiently during periods of peak demand without emitting harmful emissions.

As part of these plans, we intend to develop our own green hydrogen production facility which will supply the peaking plants, ensuring the security of supply to the peakers and enhancing our diversification as a power producer.

Case Study

Carbon capture

As part of West Burton Energy's wider decarbonisation strategy, we have partnered with Harbour Energy on the Viking CCS project, which will help to secure decarbonised energy and promote inward investment into the Nottinghamshire area. This project will also assist the government in meeting its net zero targets.

Working in collaboration with Harbour Energy, we recently undertook an initial feasibility study to connect West Burton B in Retford to the high-capacity storage sites situated beneath the Southern North Sea. This project has the potential to capture up to 90% of West Burton B's emissions, which will enable us to make strong progress towards a net zero solution.





Managing and reducing our energy consumption

We recognise that it is important to manage our energy usage to minimise our impact on the environment.

At West Burton Energy, we are dedicated to maintaining and improving the efficiency of our West Burton B CCGT by purchasing and utilising energy-efficient products, services and processes, as set out in our Environment Policy.

Looking ahead to 2023, we are working towards the ISO 50001 Energy Management Systems accreditation, which demonstrates our commitment to improving our energy efficiency and our readiness to comply with the ESOS (Energy Savings Opportunity Scheme) Regulations SI 2014/1643 and our environmental permit requirements.

To achieve the accreditation, we will consider a range of potential energy reduction measures, including assessing the most efficient techniques for the daily start-up of the CCGT units, minimising electricity consumed by plant machinery and essential equipment, and managing the provision of heat and light to our offices and other workspaces.





Case Study

Our Light Replacement Programme

We carried out work on our light replacement programme to improve the efficiency of lighting across the West Burton B site, enabling us to reduce energy consumption.

This included a large-scale replacement of our fluorescent lights to LEDs in locations across the West Burton B site, such as in the cooling tower and fan deck. In the future, we will also ensure any new light instalments on site are LED.

Additionally, we have installed motion sensor lights in some buildings to reduce usage, and conducted a full lighting survey to ensure compliance and identify any defects that could result in energy usage inefficiency.





Managing our water

We pay considerable attention to tracking all water usage from operations at the West Burton site. Specifically, we utilise ISO 14001 certified environmental management procedures and industry best practice to reduce water consumption, wherever possible.

We take our environmental obligations seriously and ensure that we are fully compliant with our licence conditions. Our Water Abstraction Licence was issued by

the Environment Agency in April 2022, and is valid until 2034.

In July 2022, we completed the 'Build Own Operate Maintain' (BOOM) water treatment project which resulted in a range of positive changes, including improving plant availability and performance, as well as reducing the need for hazardous chemicals.

This Ultra Filtrate Reverse Osmosis Water Treatment Plant replaced the

original demineralisation plant at West Burton CCGT. This enabled us to establish independence from West Burton A by no longer relying on the plant to provide the demineralised water necessary for our steam turbine generation system. With this new system in place, the water that we return to the River Trent is approximately 26% cleaner than at the point of extraction.

**Water returned
26% cleaner to
the River Trent**



Water abstraction data

Water	Unit	2022	2021
Total fresh surface water withdrawn	Thousand cubic metres	5,628	4,394
Total fresh surface water discharged back to source	Thousand cubic metres	1,162	1,226
Total fresh surface water consumed	Thousand cubic metres	3,966	3,168



Managing our waste

At West Burton Energy, we recognise the importance of careful waste management to preserve the finite resources we have on the planet. As a business, we adopt the 'reduce, reuse, recycle' approach wherever we can for our on-site operations.

Our Environmental Policy sets out our goal to minimise the use of raw materials at the site and our commitment to "zero waste directly to landfill".

Collectively, the power generated by West Burton B CCGT and on-site maintenance activities in 2022 required the disposal of 4,766 tonnes of waste. We are proud that 99.8% of

this was either recycled or recovered, with zero waste sent directly to landfill.

Throughout 2022, we adopted additional measures to minimise waste, including introducing a multi-use water bottle scheme on site to reduce plastic cup usage, and sending old Personal Protective Equipment (PPE) to a waste stream which utilises waste to generate electricity.

In 2022 99.8% of our waste was either recycled or recovered, with zero waste directly to landfill





Protecting and enhancing biodiversity

At West Burton Energy, we place great importance on acting as a steward of the land to protect and enhance biodiversity surrounding our site.

We conduct biodiversity audits to identify ecosystems and habitats close to our site to ensure that we can monitor and protect them.

Our site has minimal impact on the most protected land in the UK as we are not located within an Area of Natural Beauty (AONB) or within 1 kilometre of any sites of Special Scientific Interest (SSSI). The operational site at West Burton B is an industrialised area comprising hard surfaces and gravelled areas around the site buildings, which minimises any potential impact to biodiversity within the site boundary.

In December 2022, we carried out a biodiversity net gain assessment ahead of submitting a planning application for the new 500MW Battery Energy Storage System (BESS). We engaged with the

statutory consultees, Natural England and Historic England, to ensure we are doing all that we can to protect the biodiversity surrounding our site. The plans we have in place for the proposed site will achieve a 10% biodiversity net gain through a combination of on-site and off-site habitat creation and enhancement.

We are aware of the presence of great crested newts, a species of conservation concern in Nottinghamshire, and therefore carried out appropriate surveys ahead of submitting the BESS planning application.

Our current and past survey results have shown that the population of great crested newts at the proposed site is relatively stable and has not been affected by previous developments at West Burton Energy's Nottinghamshire site. Nevertheless, we will do all we can to protect the newts around our site in both our current operations and future plans, including the 500MW BESS project.

We work closely with the Environment Agency to ensure the protection of wildlife species, including eels, which are present in the River Trent and hence could be impacted during our extraction of river water for site operations.

Our Eel Screen Exemption Notice, which is valid until December 2023, highlights that our installation is sufficient in preventing damage, injury, harmful entrainment or the impediment of free passage of eels in our local river. We will be proactive in contacting the Environment Agency to ensure we obtain a further exemption notice upon expiry of our existing licence.

We had no major chemical, oil or fuel spills in 2022 reflecting our strong focus on preventing such events occurring at site. In the unlikely event of a spill, we have robust measures in place to track, investigate and mitigate the consequences of this.

**10% net
biodiversity
gain with
new BESS**



**0 spills
in 2022**





05 Prioritising the safety and wellbeing of people



05 Prioritising the safety and wellbeing of people

Our culture

At West Burton Energy, our talented workforce is our most important asset and we continually strive to maintain a safe, inclusive and rewarding workplace in which they can excel professionally.

We are proud that our resilient team remained focused on, and committed to, delivering reliable energy in the UK throughout 2022, achieving strong operating results as an independent business.

We seek to foster a supportive environment for everyone who works at West Burton Energy, ranging from our on-site teams at West Burton B, to those who work in our offices across the UK.

We are fully committed to maintaining a high level of transparency with all of our stakeholders and are pleased to be able to share our core values and what it's like to work at West Burton Energy in our first ESG report.





05 Prioritising the safety and wellbeing of people



It's an absolutely great place to work. We're very fortunate at West Burton Energy – we have a really positive workplace culture that is built on meaningful work, open communication, and core values. We also benefit from having a well-defined and structured mission and vision which aligns with the company's goals and values.

We're very fortunate to have a lot of dedicated and committed employees and that, for me, is absolutely fundamental to any culture. If you've got the right people working in your organisation, then your culture's right and you're set up for success.

Sam Beckett,
HR Manager at West Burton Energy





05 Prioritising the safety and wellbeing of people

What defines us?

Safety is our main priority

We have a strong safety culture and are continually on the lookout for potential hazards to mitigate any risk of accidents. We hold daily safety talks and weekly safety tours to ensure we maintain the highest degree of safety on site every day.

People-first approach

People are at the heart of everything we do at West Burton Energy. The reliability and efficiency of our 1300MW combined cycle gas-fired power plant and 49MW BESS relies upon the hard work of our dedicated team of highly trained individuals, who work around the clock to keep the lights on for families across the UK.

Agility is key

We remain agile and flexible in our approach to dealing with any unexpected circumstances when they arise. Our team is always ready to manage uncertainty and make important decisions efficiently.

Courageous in our decision-making

We encourage our people to act courageously when making decisions. The UK's energy transition towards low carbon generation poses a wide range of exciting possibilities for the future and we want our team to feel empowered to push boundaries and seize opportunities.

Enjoyable place to work

Providing an enjoyable and inspiring place to work is fundamental to us at West Burton Energy. We know how important it is to have friendly and supportive colleagues and seek to ensure that all our people feel happy and fulfilled at work every day.

Ambitious growth strategy

We have exciting plans to triple the size of our business in the next three to five years and acquire more low carbon, flexible assets to fuel the UK's energy transition.



05 Prioritising the safety and wellbeing of people

Our people

At West Burton Energy, our people are our most important asset. Throughout the organisation we work hard to ensure our people feel valued, trusted and respected.

We continually look at ways in which we can enhance our working environment by carrying out an Employee Engagement Survey twice a year to find out what our people think about working at West Burton Energy. This helps us to make any necessary improvements to our ways of working and to understand what our people value most.

The response rate for our December 2022 survey was particularly high at **91%**, our strongest score to date, with the overall results being very positive and encouraging.

We are pleased to share that **75%** of participants reported “feeling encouraged to innovate and develop new ideas to increase efficiency and improve our services.” Similarly, **73%** of respondents said that they “have confidence in the future success of West Burton Energy”, demonstrating that we are united in our goals for the future of the business.

97% of our employees agreed that health and safety is taken seriously on site and 75% of our workforce agreed that they are actively encouraged to innovate and develop new ideas to increase our efficiency and improve our services.

91%

Overall Response Rate

71

Number of Respondents

90%

2022 Mid Year Response Rate

78%

2021 End of Year Response Rate



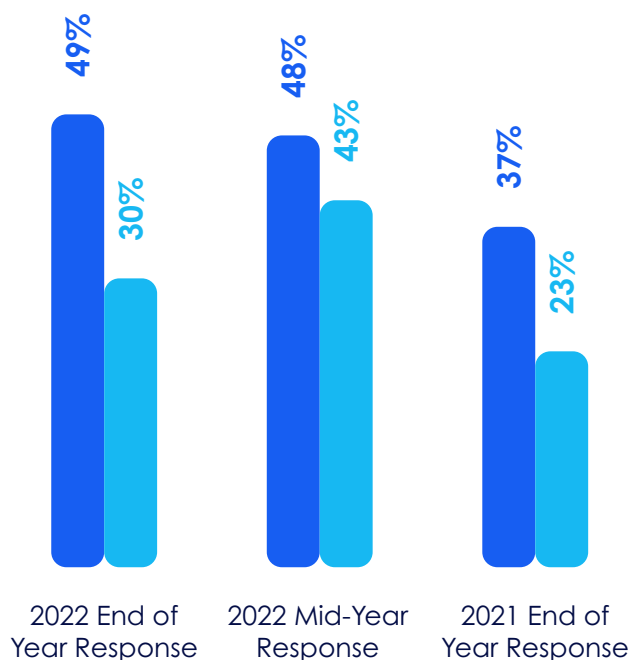
05 Prioritising the safety and wellbeing of people

Our people

We have increased the frequency of these surveys from once a year to twice a year in order to be able to implement any necessary changes in a more timely and effective manner when required.

The general feeling in my team is:

- Committed
- Showing solidarity & togetherness



With regards to staff engagement and feeling valued, West Burton Energy is the best place I have ever worked.

Feedback from our 2022 Employee Engagement Survey

At West Burton Energy, we strive to ensure that our staff are happy in their roles and are committed to a 90% retention rate.

We hold regular appraisals throughout the year which give our employees an opportunity to identify key areas of training they want to pursue and create a bespoke development plan with their line manager.

In addition, we have an open-door policy, which encourages open, face-to-face dialogue with our Executive Leadership Team, enabling our people to ask questions or raise any concerns they may have.

We also hold regular Station Briefings and Quarterly Business Updates.



05 Prioritising the safety and wellbeing of people

Our community

We strive to ensure that people in our local community and those further afield have enough power to turn their lights on and heat their homes.

We place great importance on maintaining strong relationships with our community and stakeholders as we want them to help to shape our business.

Acknowledging the vital role we play in people's everyday lives gives meaning to what we do and has inspired us to go one step further for our local community.

We are proud to be current partners of a local horticultural wellbeing charity, Muddy Fork, which supports people on their journey towards better mental health. We are also proud to have Bluebell Wood Children's Hospice as the beneficiary of donations, after being nominated as our national charity for 2023.

It is important to us that the charities we partner with reflect our people's interests, and we therefore ask for their nominations for causes close to their heart before casting a vote for the shortlisted charities.

We also embark on smaller charitable actions throughout the year. Last year, we donated two defibrillators to East Markham Primary School, continued with our collections for Bassetlaw food bank, raised £1,180 for Movember, and sponsored the North Nottinghamshire Business Awards.

Additionally, we are currently engaged with the What Next Programme, which supports 15- and 16-year-olds in the Bassetlaw area with their career development. We are pleased to share information about industry-specific career opportunities at the events, which attract around 1000 young people twice a year.



We supported the North Notts Business Awards in 2022. Local businesses have been through quite a torrid time with Covid. Their income stopped overnight in some regards, so we've decided to support them by sponsoring the very first the bounce back award for the local business community.

**Guy Le Geyt,
Maintenance and Engineering
Manager at West Burton Energy**





Diversity and Inclusion

At West Burton Energy, we are fully committed to supporting gender equality and diversity in the workplace. We welcome all forms of diversity and promote an inclusive and open culture in which people can be themselves and thrive professionally.

We are developing a Diversity and Inclusion (D&I) Action Plan which will complement the existing policies we have in place.

Our Equal Opportunity Policy ensures that our employees receive fair and equal treatment irrespective of their age, disability, race, sex, religion or belief and sexual orientation.

Additionally, our recruitment process embraces diversity and we are excited by the possibility of developing our team's breadth of knowledge and innovative ideas even further through attracting new talent.

While the power generation sector has traditionally been a male-dominated industry, we are proud of the number of women who have joined the business throughout the past year.

The number of female employees at West Burton Energy rose from 2% in 2021, to 12% at the end of 2022. We recognise that there is more to do to make our workplace more diverse and we are fully committed to taking more steps in this positive direction.

In our 'People Plan' for 2023, we are developing a specific plan to increase

diversity and inclusion at West Burton Energy. Our plan will focus on a range of different areas, such as training for our employees and our leaders, and will be in place by the end of 2023.

In the short-term, we will continue to advertise all job vacancies through LinkedIn to attract and retain a diverse range of potential candidates.

West Burton Energy recognises that individuals have different needs and that there are circumstances when certain provisions need to be put in place to support an individual.

We ask all new starters to complete a pre-health questionnaire to understand any reasonable adjustments we may need to make.

We have a number of measures to ensure the workplace, both on-site and in our offices, is accessible for people with less mobility. We are a Disability Confident Employer and are proud to have two employees trained to ensure individuals receive any reasonable adjustments they need and are supported throughout their time at West Burton Energy.

Executive team



57% Male



43% Female

Site SLT



60% Male



40% Female

Age demographic

Taken from a total of 82 colleagues





05 Prioritising the safety and wellbeing of people

Training and professional development

At West Burton Energy, we encourage our employees to participate in training sessions that will enhance their professional development and also open up new learning opportunities.

We deliver a substantial training plan every year, which is comprised of different areas of technical training to ensure our people are continually developing and refining their skills.

In 2022, our varied and comprehensive training plan included sessions on emergency preparedness, fraud and bribery prevention, Regulation on Wholesale Energy Market Integrity and Transparency (REMIT), human performance, specific power plant training and first aid amongst, others.

To support the training and development of our people,

we are working on expanding the use of our on-site plant simulator. We are in the process of developing training packages that will enable shift team members to have dedicated time on the simulator once every six weeks to further enhance their skills, learn from any potential mistakes and carry out activities.



The plant simulator gives us a real, valuable tool for people to practice in a safe environment, and also for us to be able to develop people and assess competence.

**Dean Laws Freeman,
Operations Manager
at West Burton Energy**



We delivered a total of 84 training sessions in 2022, which resulted in 565 training hours for employees across West Burton Energy.

We want everyone at West Burton Energy to feel respected and valued. For us, this is fundamental to creating an inclusive, safe and supportive working environment.

As such, we deliver Leadership Development Programmes to ensure that our managers are equipped with the necessary tools they need to be a supportive and approachable leader.

New and aspiring managers are asked to complete an Introduction to Management Training, while more experienced leaders are put forward for the Institute of Leadership and Management Level 3 in Leadership Development.



05 Prioritising the safety and wellbeing of people

Case study



My career has taken a turn away from the technical route and I'm going to actually do a Business Management and Leadership degree in October. I'm more interested at the moment with the people side of management and ensuring that the people who report in to me are doing the best they can, I'm giving them the right tools to do exactly what they want to be doing and what they need to be doing so that they're happy in their role.

Being able to further my education is a really big thing for me because at one point in my career I didn't have that backing behind me. I've got a lot of flexible working too. The flexible working helps, as I have a young son, so if I need to work from home, come in late or leave early, that's always supported.



Dan Aitken, Lead EC&I Technician at West Burton Energy, came across to the company in 2018 on a secondment and became a permanent employee in November 2019.





05 Prioritising the safety and wellbeing of people

Health and safety

As a responsible power producer, the health and safety of our people is a key focus area for us at West Burton Energy; it is both integral to our day-to-day operations and engrained in our culture.

We are committed to ensuring that our people have a safe working environment at all times, in accordance with industry best practice and applicable national regulations.

We have a strong safety culture and it is only right that we uphold the highest safety standards to eliminate instances of human errors.

Our on-site teams hold daily safety talks and pre-job briefings to discuss any specific safety topics for the day ahead, as well discussing the running of the power plant. Similarly, a safety briefing is also held on-site at the end of each day to maintain high health and safety standards at all times.

We have an excellent reporting culture at West Burton Energy, whereby individuals can easily report incidents and safety observations online,

in person or via a paper slip, allowing many avenues to improve our health and safety procedures.

All incidents are discussed at our morning safety talk to ensure that everyone is aware of the event to prevent reoccurrences. This also ensures actions are tracked through our Document Management System (DMS) and can be thoroughly investigated.

Our Health, Safety, Environment and Security (HSES) Forum meetings are held monthly and enable our business to achieve our company-wide objective of Zero Harm by:

- Promoting a health and safety culture;
- Sharing best practice and feedback across the business;
- Encouraging co-operation from our staff and contract partners; and
- Driving continual improvement in our HSES performance.





05 Prioritising the safety and wellbeing of people

Health and safety

We recently delivered Human Performance (HU) Training for our employees and core contract staff to equip our people with the tools they need to drive down human errors that can cause accidents.

We are pleased that 30% of our employees on site have the IOSH Managing Safely qualification, which equips them with the knowledge and key skills needed to manage health and safety within teams every day.

To ensure a safety-first approach across the business, the Executive Leadership Team's Key Performance Indicators (KPIs) are interlinked with broader safety KPIs. A representative from the Executive Leadership Team, for instance, attends every HSES Forum and no less than ten safety tours per year. Our Executive Leadership Team is also responsible for undertaking a formal half year review of the HSE and Wellbeing Strategy, safety metric and performance to ensure the business is operating as safely as possible.

We are proud to report only one minor health and safety incident in 2022, namely a sprained ankle, which is testament to the breadth and rigour of safety measures we have in place to protect our people.

Our frequent safety tours have made a marked difference to our site over the last year, with particular improvements implemented in our PAT testing procedures, equipment labelling and general lighting.



Safety is our number one priority, whether that's the safety of our people both physically and mentally, our environment or our plant. We actively encourage employees to suggest new safety measures, so that we can make improvements that will prevent people being hurt and ultimately make sure our teams go home to their families, in at least as good health as they arrived at work.

Christina Greenwood,
Health, Safety and Environmental Manager



1 incident
in 2022



Safety inspections
conducted



Actions
Created



Average HSES
Inspection
Score



Employees think
health and safety
is taken seriously



05 Prioritising the safety and wellbeing of people

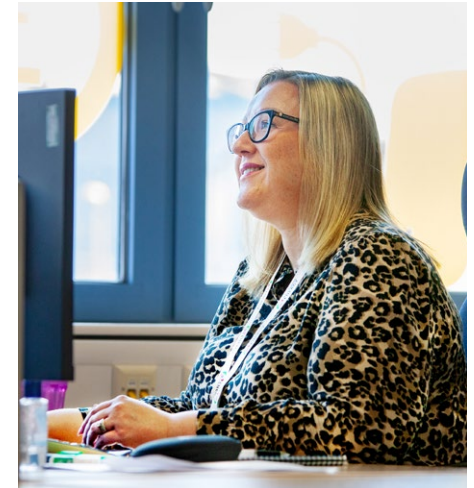
Wellbeing

Our people are at the heart of everything that we do. West Burton Energy has an extensive well-being programme, consisting of workshops and informal events, available for all our employees.

Throughout 2022, we delivered 85 webinars across 12 different well-being themes, such as managing

stress, mental health and the importance of nutrition and hydration. We also hosted two Mental Health and First Aid (MHFA) coffee mornings. We are continuing with this exciting well-being programme to support our colleagues in 2023, where well-being events and activities are advertised to all our employees on our monthly well-being calendar.

We currently have six mental health first aiders to support our people across West Burton Energy. Employees can approach mental health first aiders in person or contact them via Microsoft Teams, mobile or through a dedicated email address. We recognise the importance of ensuring colleagues know that support is in place should they need it.



I'm a mental health first aider and have a keen interest in that for a number of reasons. I feel I'm a people person; I have good interaction with people, and I want the best for them. So mental well-being is certainly a big thing in my life.

**Lee Stocks,
Shift Manager, Operations at West Burton Energy**



We also provide a wide range of health and well-being benefits to our employees, including:

- Flexible working arrangements to suit our employees' needs;
- Reduced cost access to local gyms and personal trainers to make exercise accessible to all;
- Healthcare cover with SimplyHealth;
- Occupational Health Provision to protect the health and welfare of our people in the workplace. Our Occupational Health Provision includes scheduled health surveillances once a year for all operational employees who are out on site;
- An Employee Assistance Programme which provides support for all our people when required by confidentially helping them with any problems they may be experiencing;
- Weekly walking club to encourage and support an active workforce.



06 Our approach to governance



Acting as a responsible business

At West Burton Energy, we fully understand the importance of being a responsible business and take steps to ensure that we continually adhere to the highest ethical and legal standards.

We have a comprehensive range of policies and procedures in place to ensure that we are fully compliant with all applicable laws and regulations in the heavily regulated sector in which we operate.

As part of our duty as a responsible employer, we seek to ensure that all employees understand their need

to conduct themselves ethically and legally in the workplace, or at a work-related event.

During our HR and Health, Safety and Environment inductions, we familiarise all new starters with our Code of Conduct, which requires all employees to always act in accordance with West Burton Energy policies and procedures to protect the interests of the business, colleagues and the environment alike.

Our Code of Conduct sets out the high standards we expect all employees to adhere to in relation

to health and safety, behaviour towards others, relationships with suppliers, bribery, fraud and tax evasion, and the declaration of conflicts of interests.

We have recently undertaken a full review of our policies and have implemented new anti-money laundering, antibribery and corruption, and sanctions policies, amongst others.

We have also implemented a new corporate risk and opportunities register and related policy, and updated other policies as required

to ensure they are fit for purpose for the business moving forward. Our policies and procedures are regularly reviewed and updated to ensure they remain relevant and provide adequate support to our business.

In addition, our employees completed Fraud and Bribery Prevention e-learning training in 2022, alongside REMIT training to ensure a responsible approach to business practice across the company.





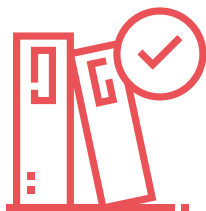
06 Our approach to governance

Open reporting culture

We know that raising concerns about potential wrongful conduct or another business issue is crucial for safety, compliance and ultimately a reputable business and we are committed to promoting and encouraging a culture of openness, integrity and accountability.

We have an external whistleblowing hotline, SafeCall, available for any employees or contractors who wish to report serious concerns or have questions about our business practice. All issues raised are confidential and we ensure that our employees are aware of this so that they are not dissuaded from using the hotline when necessary.

Any lessons learnt or updates to our policies and procedures are circulated as appropriate via our weekly newsletter.



Board of Directors

The ultimate holding company of the West Burton Energy Group is UK Transition Power Holdings. Ltd (UKTPH). The board of directors of UKTPH comprises our Chief Executive Officer, two representatives of EIG, our investor, and an independent director. The Board is required to act in accordance with the Board Terms of Reference, which we developed in 2022 in collaboration with EIG to ensure good governance and business integrity.

Responsibilities dealt with by our Board include major operating and capital expenditure, West Burton Energy's commercial strategy and growth strategy and changes thereto, and approval of material transactions or contracts.

West Burton Energy's directors are fully aware of their responsibilities to act in a way that promotes the success of the company for the benefit of members, whilst having regard to the impact of the company's operations on the community and the environment in accordance with s172 Companies Act (2006).





Ethical procurement practices

At West Burton Energy, we are committed to doing all that we can to ensure our supply chain is as responsible and ethical as possible.

Our Supply Chain Policy, which was most recently updated in August 2022, sets out our minimum company standards that must be implemented across all supply chain activities to ensure West Burton Energy realises best value, whilst controlling risk exposure for the benefit of our shareholders. The policy requires our company standards for Health and Safety, Ethics, Sustainability, Diversity and Inclusion and Environmental Protection to be maintained in all supply chain activities and aligns with the ten principles of the United Nations Global Compact initiative.

We utilise the Achilles supplier management system to enable us to maintain robust and ethical procurement practices, by ensuring we only engage and work with organisations that reflect our values and standards. The use of Achilles offers us greater visibility of our existing suppliers and their compliance with applicable legislation and standards and enables us to appropriately assess new suppliers, including their ESG performance rating, prior to onboarding.



Our local community and its supply chain is a key consideration within our business ethics, engaging with local businesses and supporting sustainability with companies like Nibbles, our local catering company, is a key enabler of providing this.

**Ged Button,
Business Manager
at West Burton Energy**



Our Conditions of Contract, which we have for the provision of on-site services and the supply, repair or installation of the plant, prohibits the counterparty contractor engaging in bribery, and requires the contractor to comply with all applicable anti-slavery and human trafficking laws and regulations including the Modern Slavery Act (2015).

Similarly, our Achilles system enables us to detect all suppliers which have anti-slavery and anti-corruption policies in place, and those who have made the commitment to pay all employees and subcontractors the Real Living Wage (RLW). Our policies are aligned with anti-fraud and bribery legislation to avoid these risks to our supply chain.



Legal and regulatory compliance

At West Burton Energy, we take compliance with all applicable laws, environmental regulations and standards seriously, given the highly regulated nature of the sector in which we operate.

When conducting commercial activities and business transactions, we do our utmost to ensure we are compliant in all respects, be it our obligations and requirements under the Companies Act (2006), pursuant to REMIT, as retained under national legislation following Brexit, or otherwise.

West Burton Energy is committed to full compliance with its statutory tax obligations and full disclosure to relevant tax authorities as required. West Burton Energy's tax affairs are managed in line with the overall high standards of governance, as set out in West Burton Energy's annual tax strategy published on our website.

Furthermore, in accordance with the Streamlined Energy and Carbon Reporting (SECR) framework introduced in April 2019, we disclose our GHG calculations and energy usage in our annual Director's Report

which forms a part of our statutory annual accounts.

It goes without saying that safety is a key priority for us as a power generation business. We have robust health and safety policies and procedures in place to reduce the risk of harm to our people in the workplace to ensure we retain our ISO 45001 Occupational Health and Safety certification.

Our ISO 9001 Quality Management accreditation assists our desire to continually improve our management

systems, by streamlining operations and helping us to build a more resilient, sustainable business.

Our ISO 14001 accreditation also ensures our compliance with environmental management obligations across our West Burton B site.

Cyber security and data protection

As a standalone business with our own IT systems, we have conducted a full review of our approach to cyber security to ensure we are fully protected against a cyber-attack and follow all requirements under the data protection regulations. Given the detrimental impact a cyber-attack would have on our operations and business as a whole, maintaining robust cyber security measures and

protocols is of critical importance to us at West Burton Energy. Our Adverse Events policy details the actions we would take in an adverse event, including a cyber-attack. We are pleased to report that an independent cyber security audit found no major concerns with our approach.

Cyber Security Good Practice (e.g. Cyber Essentials certification) is

important to us, especially given our regulatory obligations in relation to asset dispatch and communications with National Grid. We have engaged a third party to conduct a Cyber Essentials accreditation programme and Security of Network & Information Systems (NIS) pre-compliance check.

While we do not need to be NIS compliant today given the size of West

Burton Energy's current portfolio, we are keen to future-proof our business from a cyber security perspective. Our key areas of focus to achieve Cyber Essentials certification are updating and maintaining IT policies and procedures and cyber-awareness training for all staff which we will focus on as a priority in 2023.



Stakeholder engagement and management

Our stakeholders are important to us at West Burton Energy, and we want them to feel involved in our journey every step of the way as we continue to grow and develop as a business.

We actively engage with a wide variety of internal and external stakeholders, from our employees

to energy and environment regulators, and local businesses and charities. As a responsible business, we recognise the importance of supporting those around us on a daily basis, whether that be through delivering safe and reliable energy or supporting local charities and sponsoring events.



We like to work collaboratively with all our stakeholders. The Environment Agency recently brought their new employees to our site to see measures in place and enhance their operational understanding.

Mike Nason,
Station Manager at
West Burton Energy



Engagement with our community

We appreciate that establishing and maintaining collaborative relationships with our neighbours and stakeholders is imperative to our success.

We have a dedicated Community and Stakeholders Policy to ensure that we take the necessary proactive steps and time to anticipate, understand and respond to the community in

which we operate. Our impact on our local community, environmentally and socially, is always forefront of our minds in everything we do.

We strive to achieve a mutual level of trust with all our stakeholders and are continually looking at ways in which we can exceed their needs. Our ISO 9001 accreditation demonstrates

that we are meeting stakeholder and regulatory requirements and we are always looking at ways to continuously improve. For instance, we work closely with the Environment Agency to ensure we are adhering to the necessary environmental measures to protect our surroundings. We welcome feedback from our stakeholders and always ensure

that any feedback received is reviewed by the Senior Leadership Team to ensure we capture and act on any potential learning opportunities. Depending on the circumstance, the feedback may also be fed into our Near Hit system, enabling us to fully investigate the event or incident.



Engagement with our investor

At West Burton Energy, we place great importance on maintaining the positive working relationship we have with our investor, EIG. We work closely and collaboratively with EIG, holding monthly management meetings, quarterly face-to-face board meetings, and regular calls and online meetings as growth opportunities arise. We value this relationship and look forward to continuing to work closely with EIG in the coming years.

Our key stakeholders at the West Burton B site include:

- Employees
- Future employees
- Our investor, EIG
- Local residents
- Local businesses, charities and schools
- Bassetlaw District Council
- Nottinghamshire County Council
- EDF, owner of the adjacent facility
- Health and Safety Executive
- The Environment Agency
- National Grid ESO
- National Grid Gas
- Ofgem
- Key equipment suppliers, including General Electric
- Key banks and lenders
- Trade Unions

Engagement with industry and government stakeholders

We recognise the value of collaborating with government stakeholders and our industry peers to facilitate the UK's energy transition and net zero goals. We are proud to be a member the Joint Environmental Programme (JEP) and Energy UK, which enables us to discuss and engage with issues across the UK energy sector.

In February 2022, we joined the Independent Generators Group (IGG) as the 10th energy industry player. As part of this group, we engage with key industry stakeholders, including Ofgem and the Department for Energy Security and Net Zero, to provide a constructive voice on issues of common interest in the UK's energy sector and promote solutions to facilitate the transition to a carbon neutral world.



07 Looking to the future



Looking to the future

As we continue to navigate our way through the energy transition, we understand that we have an important role to play in keeping the lights on for households across the UK.

Energy security, safety and reliability remain our key focus areas as we look at ways in which we can utilise our existing infrastructure at West Burton B to continue to provide reliable energy to the UK in an ever-changing world.

The success of our 49MW battery project has shown that we can deliver forward-thinking energy solutions and is testament to our commitment to a low carbon future.

It is only through the hard work of our team that we've been able to go one step further by submitting exciting plans for West Burton C, a 500MW battery storage unit on our site in Retford.

We believe that battery storage technology will support the stability of the UK's national grid network throughout the energy transition period by providing power when renewable generation sources are unavailable.

We will continue to operate as a people-centric, forward-thinking business, which places great importance on making our people and stakeholders a key priority in everything that we do.



On a planet with finite resources, a linear take-make-waste business model is unsustainable. We recognise the need to embed circular economy principles in everything we do at West Burton Energy to the extent possible. We are acutely aware that the energy industry is a significant contributor to climate change which is why we have developed a decarbonisation strategy and are actively pursuing zero emission BESS projects as part of our growth strategy.

In 2023, we will strengthen our efforts as a responsible business. We will ensure we maintain the effective initiatives, policies, procedures and processes we already have in place, whilst also dedicating time and resources to areas we know require improvement from a sustainability perspective.

Katy Norman
General Counsel and ESG Co-Lead
at West Burton Energy





In 2023, we aim to:

Environment

- Achieve ISO 50001 Energy Management Systems accreditation, demonstrating we are committed to addressing our environmental impact, conserving resources and improving our bottom line through efficient energy management
- Maintain our 2022 record of zero waste to landfill

Social

- Roll out a 'Diversity and Inclusion Plan' as part of the on-going 'People Plan' to raise awareness of Diversity and Inclusion across our business
- Go one step further in securing and demonstrating fair pay for WBE employees and contract staff by becoming Real Living Wage (RLW) certified by 2024

Governance

- Continue to strengthen governance by implementing at least three of the highest priority policies highlighted in our policy gap analysis conducted in 2022
- Create our ESG Strategy, setting out the environmental, social, and governance factors we believe are intrinsically important for our current and future business operations
- Fully assess our cyber security systems and processes to ensure they are robust and fit for purpose and put in place cyber insurance as needed to mitigate cyber-related risks

Transparency is key.

We will transparently report on any ongoing or new sustainability challenges in our 2023 ESG report next year.



For further information or to make an enquiry,
you can write to us or contact us by email via:

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