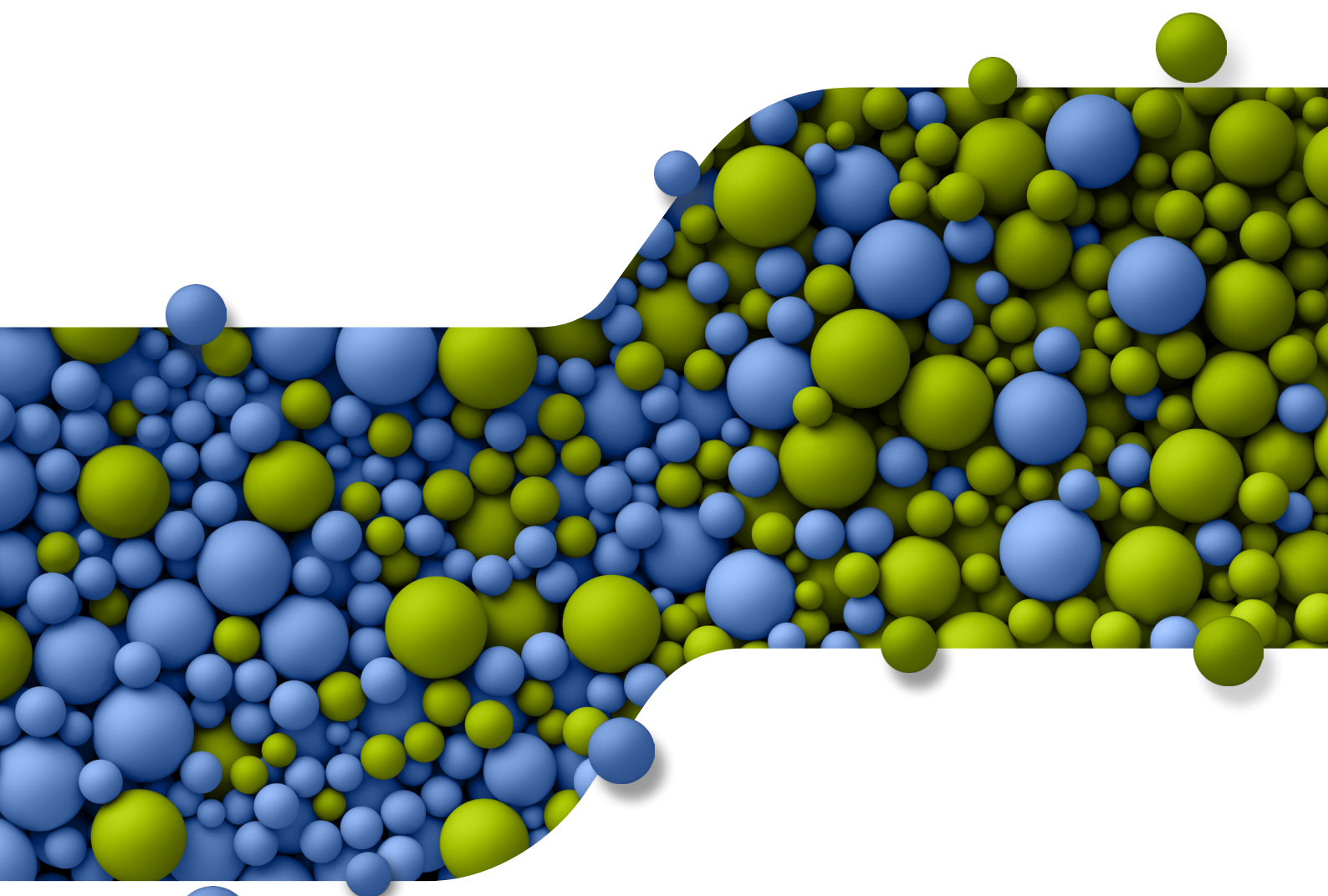


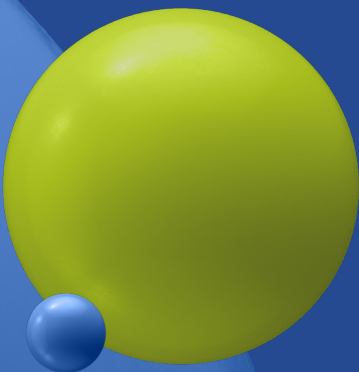
Environment, Social and Governance report 2024



ESSAR ENERGY TRANSITION



FUELS



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Prelude from EET Fuels' Chairman

It is with great conviction and immense pride that we present EET Fuels' first ESG Report. This is a reflection of our ongoing efforts to align our strategies with global sustainability goals and contribute meaningfully to the transition toward a cleaner, greener future.

Energy lies at the heart of economic and social progress, and Essar has long been a catalyst for evolutionary growth across key industries.

In the UK, our presence is defined by our pioneering efforts in energy transformation. Our Stanlow Refinery, a cornerstone of the UK's energy infrastructure, is at the forefront of our decarbonisation journey. Through Essar Energy Transition (EET), we are developing low carbon projects that will redefine energy production and consumption.

EET Fuel's ESG strategy is rooted in the principles of the United Nations Sustainable Development Goals (SDGs), which represent a universal call to action to address some of the most pressing global challenges. Among the 17 SDGs, we have prioritised seven goals where our businesses can create the most significant impact. These include ensuring access to affordable and sustainable energy (Goal 7), taking urgent action to combat climate change (Goal 13), promoting sustainable economic growth and decent work (Goal 8), and fostering resilient infrastructure and innovation (Goal 9).

Across our global verticals — Energy, Infrastructure, Metals & Mining, and Technology & Retail — we are embedding sustainability into the very fabric of our operations. Whether it is through pioneering low carbon hydrogen projects in the UK, advancing a gas-centric economy, building green mobility ecosystems, or driving the shift to green steel manufacturing, we are committed to delivering solutions that balance economic growth with environmental stewardship.

This ESG report is not just a document; it is a testament to our belief that sustainability is not an obligation but an opportunity.

By leveraging tools like the SDG Compass, we aim to align our performance indicators with our priority SDGs, ensuring that we measure progress and remain accountable to our stakeholders.

As we navigate an increasingly complex global landscape, we recognise that collaboration and innovation are key to addressing the challenges of our time. At Essar, we are not only focused on building a more sustainable business but also on contributing to a future where economic development goes hand-in-hand with social equity and environmental responsibility.

This report marks an important milestone in our journey, but it is only the beginning. Together with our partners, stakeholders, and communities, we are determined to lead by example and create a legacy of sustainable value for generations to come.

Thank you for your continued trust and support as we embark on this transformative journey.



Prashant Ruia

Chairman, EET Fuels

Foreword from EET Fuels' CEO

EET Fuels is proud to publish our inaugural EET Fuels Environment, Social and Governance (ESG) report. This report highlights our commitment to ESG and showcases the progress we have made to transform our business. It also serves as a starting point to clearly articulate our ambitions and strategic direction as we move forward.

EET Fuels is determined to lead a global industry transformation. We are adopting innovative and responsible practices to benefit not only our own business, but our environment and our community. As we shift towards our future, EET Fuels remains focussed on how our changes will benefit our people and our communities. We are creating new opportunities, building stronger partnerships and ensuring everyone is part of this transformative journey.

In this report, we have collected the initiatives and achievements undertaken by our teams across the Group, outlining the intention to embed our ESG approach into day-to-day operations, the ambitious targets we have set, and the actionable plans to achieve them. These efforts reflect both our responsibilities and the commitment of our people to creating meaningful and lasting change.

At the heart of this journey is collaboration. Achieving our ESG targets requires close partnerships with stakeholders on a regional, national and global scale. We are proud to work alongside partners in the UK and contribute to transformative projects such as HyNet, engaging with governments and experts worldwide. These collaborations are crucial to developing our learning, allowing us to deliver significant reductions in our carbon emissions and supercharge our transition to low carbon processes.

For EET Fuels, our transition is both a necessity and an opportunity. As an organisation, we are committed to leading the transition towards low carbon and sustainable industrial models. This commitment requires groundbreaking innovation and global

leadership. We are driven by our ambition and determination to transform the landscapes we operate in and provide a secure future for our people and our communities.

As we use this ESG report as an opportunity to reflect, we believe our transformation is not only achievable, but essential. It is vital that an organisation in our world-leading position showcases the way to create meaningful change with responsibility and innovation. EET Fuels continues to demonstrate a transformative future is within our reach.



Deepak K Maheshwari
CEO, EET Fuels

Introduction

Overview

Welcome to EET Fuels' Environment, Social and Governance (ESG) report. EET Fuels is a leading player in the decarbonisation of the UK economy and is poised to become the UK's first low carbon process refinery, with a roadmap to invest \$1.2bn over the next five years to lower emissions by decarbonising our production processes.

This report summarises our approach to ESG and documents how we perform today, to transform our business for tomorrow. This introductory section of the report details how we manage ESG and the key focus areas we prioritise here at EET Fuels.



This section includes:

- Foreword from EET Fuels' CEO
- About EET Fuels
- ESG performance elements
- ESG at EET
- Our key ESG focus areas

About EET Fuels

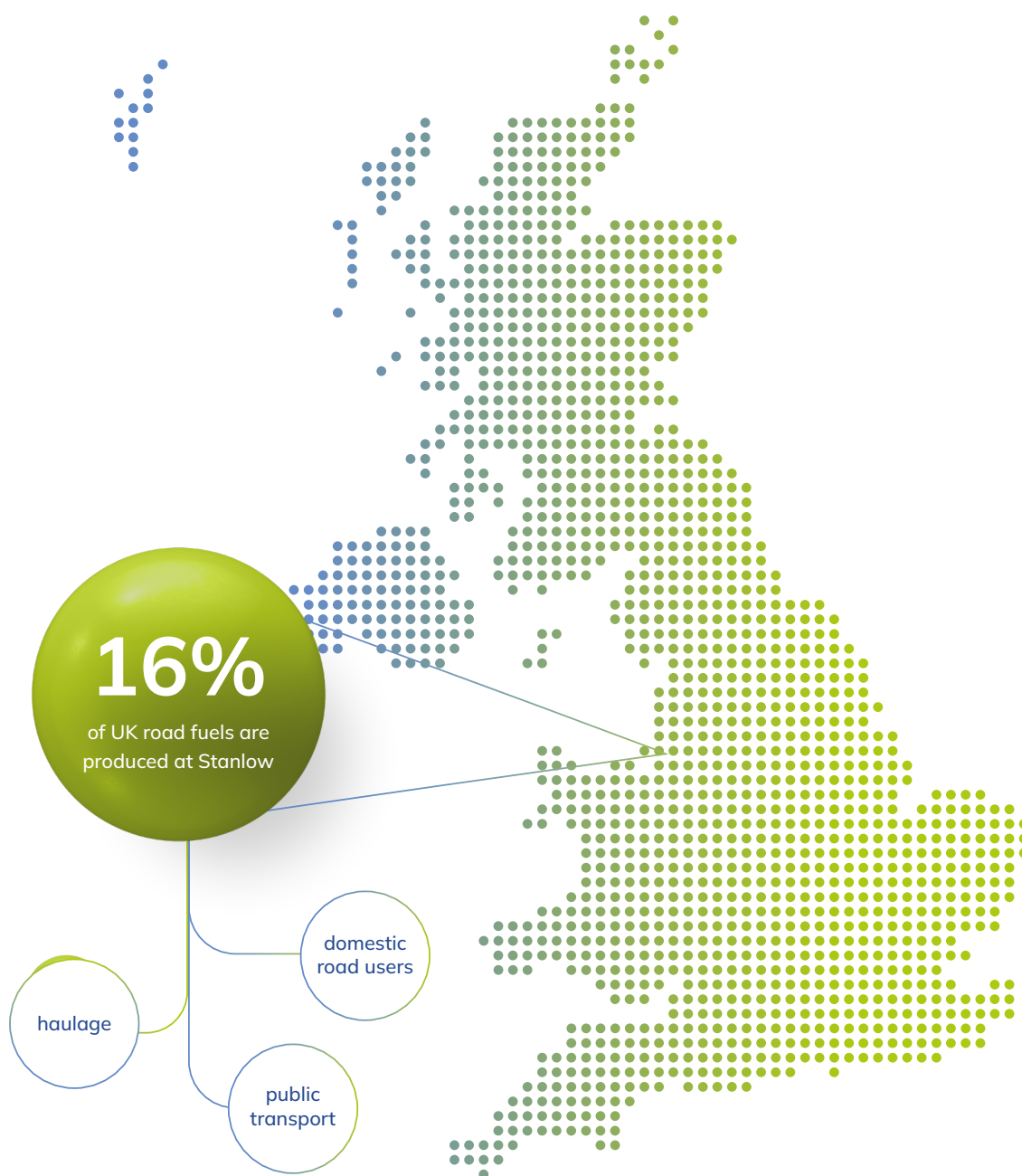
In January of 2024, we adopted the trading name of EET Fuels, as part of the wider Essar Energy Transition (EET) group of companies ('the Group'), to signal our ambition to playing a leading role in the energy transition.

At EET Fuels ('we', 'our', 'the Company'), we are a leading player in the decarbonisation of the UK economy through the delivery of an energy transition hub at our Stanlow Manufacturing Complex in the heart of the North West near Chester, Liverpool, and Manchester.

Stanlow is a strategic refinery producing vital fuels for UK transportation – around 16% of UK road fuels are produced here. The process of making refined products is carbon intensive, and, like most refineries, Stanlow is a substantial emitter of CO₂. To ensure the UK's energy security and keep our economy moving forward, we will continue manufacturing these vital, hard-to-abate fuels for customers but are committed to significantly reducing the CO₂ emissions associated with their production – reducing our emissions by 95% by 2030. Delivery of this ambition will mean that Stanlow is the first low carbon process refinery in the world.

Our Stanlow site has become the hub for EET's investments in hydrogen production and energy transition businesses.

EET Fuels is at the heart of HyNet – selected by the UK Government as one of the first two industrial decarbonisation clusters. HyNet's CO₂ pipeline and hydrogen pipeline will serve Stanlow. EET Hydrogen is developing 1.35GW of low carbon hydrogen with follow-on capacity of up to 4GW to decarbonise regional manufacturing and power generation across the whole of the North West and North Wales.



Our ESG approach

Environmental, social and governance

Our ESG approach refers to the three core principles that are used to measure and evaluate responsible businesses. Sustainable and responsible business practices are pivotal to our relationships with investors, regulators, and other key stakeholders.

Environmental performance

We are committed to the highest standards of environmental performance and plan to eliminate our operational carbon emissions.

Social stewardship

We are committed to building high-quality relationships with our people and our community. Through the community programme, we aim to be a catalyst for positive change in society.

Robust governance

Led by the Board, we are committed to promoting our purpose within the organisation and ensure that our strategy, objectives and culture align with our purpose.

ESG performance elements

Environmental performance



95% reduction by 2030

Our plans to deliver the UK's first low carbon process refinery by 2030 are expected to provide a 95% reduction in the CO₂ emissions associated with our operations compared to our 2023 baseline.



£1.2bn invested by 2030

£100 million invested in refinery decarbonisation over the last 4 years with a project pipeline framed to deliver a £1.2 billion investment by 2030.



250MW low carbon power production

EET Hydrogen Power expect production capacity of 200MW through EET Fuels' hydrogen-ready combined heat and power plant.



Over 160 hectare nature reserve

Gowy Meadows is owned by EET Fuels and managed by Cheshire Wildlife Trust providing a valued community asset.



More than 150 bird species protected

Over 150 bird species have been recorded at Gowy Meadows.

Social stewardship



5% reduction in gender pay gap

Between 2022 and 2023, we reduced our average gender pay gap from 19.4% to 14.4% (average).



20 weeks Triple Goal Zero

In the financial year ending 31 March 2024, EET Fuels has achieved 20 weeks of Triple Goal Zero (i.e., no personal safety, environmental, or process safety incidents).



£50k given to our communities

Our community fund contributed to 19 different projects in 2023, an increase of 35% on the previous year, for a total of £50k.

Robust governance



Key member of HyNet

Key member of HyNet, supporting a low carbon future, creating jobs and unlocking new skills, and decarbonising energy in the UK.

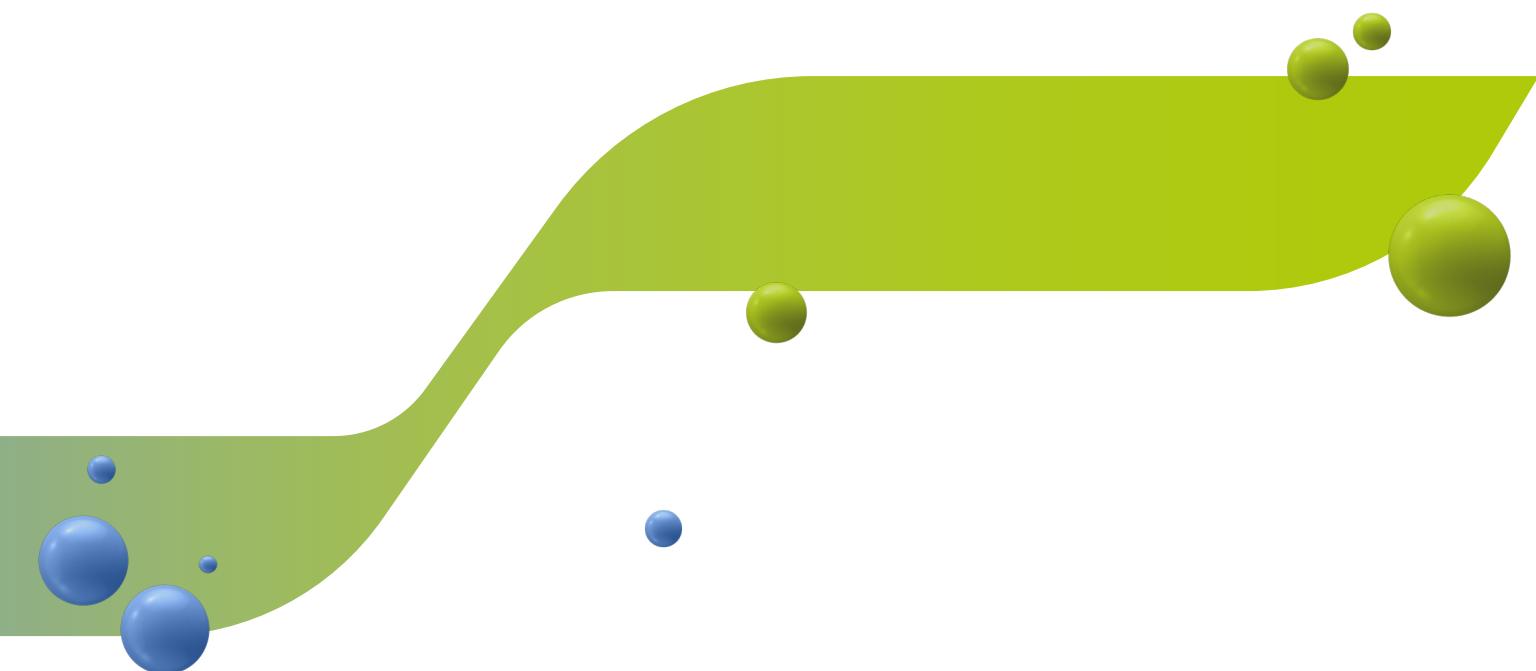


Fully embedded Wates Principles

Embedded all elements of the Wates Corporate Governance Principles for Large Companies into our governance approach.

ESG at EET Fuels

As one of the leading players in the UK's energy industry with a pivotal position in the country's decarbonisation journey, EET Fuels is committed to continuous improvement across every aspect of our organisation. We are committed to delivering operational excellence with a focus on environmental, social and governance issues and acting in the best interests of society, the Company, our colleagues and our communities while meeting the expectations of our wider stakeholders.





Our ESG alignment to UN Sustainable Development Goals

Energy is a fundamental component of the global economy, playing a crucial role in driving economic and social development. The industry supports sustainable development in a number of ways, including the creation of direct and indirect employment opportunities, fostering the development of advanced technologies and products through research and development, and the construction of critical infrastructure.

We acknowledge the important role that corporations play in global sustainability and how aligning business operations and strategic priorities to environmental and social wellbeing, as well as fair and just

development, can lead to a more equitable and sustainable world.

We therefore align our strategic and operational activities to the United Nation's ('UN's') Sustainable Development Goals ('SDGs'), a set of 17 goals connected by their focus on an urgent call to action by all countries and corporations to tackle inequality, climate change, health and education issues, all the while enhancing economic growth.

EET Fuels has identified the following seven SDGs as being those where our operations and strategies can have the

greatest impact, to do our part in meeting the world's environmental, social, and economic challenges.

They are presented below at the goal level and have been aligned with the most relevant corresponding pillar of ESG within this report. We fully acknowledge that the UN SDGs span the entirety of ESG and do not occur in isolation.

Environment



Goal 7: Ensure access to affordable, reliable, sustainable and modern energy for all.



Goal 13: Take urgent action to combat climate change and its impacts.



Goal 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.

Social



Goal 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.



Goal 5: Achieve gender equality and empower all women and girls.

Governance



Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.



Goal 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation.

Our key ESG focus areas

Decarbonising our operations and supporting the UK's net zero 2050 goals

EET Fuels is committed to becoming the UK's first low carbon process refinery, investing £1.2bn over the next five years to lower emissions by decarbonising production processes. Our goal is to reduce our emissions by 95%, compared to a 2023 baseline, by 2030. We have developed a comprehensive plan to decarbonise our refinery operations utilising energy efficiency, fuel switching to hydrogen, and carbon capture and storage.

Our efforts will place us amongst the first low carbon process refineries globally, setting the global benchmark for lower emitting refineries and showcasing the pathway to decarbonise high emitting industries.

EET Fuels' decarbonisation plans and broader operational focuses align with the UK Government's Green Energy Superpower Mission and the previous Government's Green Industrial Revolution Ten Point Plan. Published in 2020, this plan combines policy with both public and private investment. It lays the foundations for a Green Industrial Revolution, seeking to simultaneously stop climate change, transform the UK economy, and deliver jobs. It is worth noting that the UK Government's Ten Point Plan for a Green Industrial Revolution was published under the 2019 to 2022 Johnson Conservative Government – and there has been continuity of policy goals with the July 2024 Starmer Government.

The Labour Government's mission to make the UK a clean energy superpower is aligned to our priorities. The mission is underpinned by initiatives and priorities that support and are supported by our decarbonisation activities, such as delivering low carbon process fuel by 2030, enabling public and private partnerships and funding for clean energy projects through Great British Energy, supporting the energy transition workforce, and ultimately accelerating Net Zero – especially in high emission sectors.

The UK Government is seeking to double the government's target on green hydrogen, with 10GW of production for particular use in flexible power generation, storage, and industry. EET Hydrogen is a key player in the transition to low carbon hydrogen, working to deliver over 1 GW of production across the UK. Further information on our decarbonisation journey has been provided in the Environmental performance section of this report (page 16).

Our efforts will place us amongst the first low carbon process refineries globally, setting the global benchmark for lower emitting refineries and showcasing the pathway to decarbonise high emitting industries.

Focussed on collaboration

Our Stanlow facility sits at the heart of HyNet, the UK's leading industrial decarbonisation cluster. HyNet consists of several companies that will collectively produce, transport, and store low carbon hydrogen alongside the capture and storage of carbon dioxide emissions from industry in the North West and North Wales.

Through EET Hydrogen, we are the only supplier of large-scale low carbon hydrogen within the HyNet cluster, making our position with the cluster key for collaboration with other HyNet members.

EET Fuels and EET Hydrogen are at the forefront of industrial decarbonisation efforts, leveraging innovative technologies and government support to achieve net zero emissions. This commitment to sustainability will not only decarbonise our own energy demand, but also contribute to creating a hydrogen economy in the region and drive positive change in the energy landscape.

Enhancing the nation's energy security

Energy security refers to the uninterrupted availability of energy at an affordable price. Events in recent years have highlighted the susceptibility of overseas energy to external risks such as geopolitical instability, supply disruptions, or restrictions on certain rare minerals that many energy technologies depend on.

The UK has faced the worst cost of living crisis in a generation, a key contributor being soaring energy bills. Achieving energy security facilitates resilience, reducing the UK's dependence on energy imports and can also yield economic growth and job creation.

Overall, energy security is dependent on a number of factors, such as domestic energy production, the diversification of energy sources, energy efficiency, infrastructure resilience, strategic reserves, and technological innovation.

Our holistic approach to achieving national energy security spans all these dependencies, promoting diversified energy sources via our investments in low carbon hydrogen production, biofuel development, carbon capture and storage, and infrastructure development.



EET Fuels Stanlow at the heart of the HyNet decarbonisation cluster

Committed to health and safety through Triple Goal Zero

We are committed to achieving excellence in safety and environmental performance and aim to ensure no harm to people, to maintain a sustainable environment, and to institutionalise a culture of safety throughout our organisation. EET Fuels' approach is informed by the Environmental Permitting and Control of Major Accident Hazards (COMAH) Regulations. These provide the structure for safety performance at our site.

Through our Triple Goal Zero initiative, we work to maintain safe and healthy working conditions for our employees and follow leading operating practices to manage and mitigate operational downtime and the potential impact of our activities on our neighbours and the environment.

Enabling the workforce of the energy transition

A skilled labour force is essential for the successful delivery of our decarbonisation efforts and the broader global energy transition. We are committed to the development of our existing workforce, the recruitment and training of apprenticeships and graduates and working with partners such as the HyNet Training Board.

As part of our decarbonisation strategy, we plan to provide training and development opportunities, equipping employees with the necessary skills to excel in current and future roles by following a structured and positive plan.

Environmental performance

Overview

EET Fuels is committed to the highest standards of environmental performance and to reducing the emissions associated with our operations by 95% by 2030. This section of our ESG report describes our approach to managing those environmental factors which are material to our business.

Regular reporting of all material environmental impacts is undertaken and provided quarterly and annually to the Environment Agency. This delivers compliance with the permits which have been granted to the company under the requirements of the Environmental Permitting Regulations.



This section includes:

- SDGs and our environmental impacts
- Our decarbonisation journey
- Our role in the nation's energy security
- Our greenhouse gas emissions
- Our climate management approach
- Our management of environmental impacts

Sustainable Development Goals (SDGs)

and our environmental impacts



Goal 7: Ensure access to affordable, reliable, sustainable and modern energy for all

7.2 Increase global percentage of renewable energy

Historically, global development has heavily depended on affordable, energy-dense fossil fuels – the main contributors to greenhouse gas (GHG) emissions and climate change. Emerging technologies, such as biofuels and hydrogen, offer the potential to steer development towards a more sustainable path.

Increasing the global percentage of renewable energy is an essential part of diversifying the UK's energy mix, reducing dependency on energy imports, and facilitating energy security. The provision of affordable, reliable, sustainable, and modern energy for all echoes the UK Government's plans to turn the UK into a "clean energy superpower". The achievement of which can potentially cut energy bills, create jobs, and deliver energy security.

EET is positioned to substantially contribute to increasing the global percentage of low carbon process fuels through our investments and operations into hydrogen. Our key role in HyNet will enable us to support fuel resilience throughout the UK and beyond, while our decarbonisation efforts will support low carbon process products to support the early stages of energy transition.



Goal 13: Take urgent action to combat climate change and its impacts

13.3 Build knowledge and capacity to meet climate change

To limit the increase in global average temperature to well below 2°C, and ideally to 1.5°C, current systems – such as energy, industry, transport, food, agriculture, and forestry – must fundamentally change to achieve net zero emissions by the second half of this century.

However, the capacity and capability necessary to transition these systems and meet climate change goals is underpinned by education, continuously building knowledge to keep up with changing best practice, regulatory requirements, and technical advancements. With such knowledge, organisations are then able to simultaneously anticipate, adapt, and build resilience to current and future climate impacts.

Our approach to combating climate change is rooted in our employees of today and tomorrow. We promote a culture of continuous learning and growth within EET Fuels. We support understanding the basics of climate change to developing proficiency in technical skills, supported by partners such as the HyNet Academy, that will enable us to meet our decarbonisation goals and create positive impact on our communities and environment. Looking to our future, we prioritise fostering the climate leaders of tomorrow throughout all levels of education in our communities through direct school outreach and valuable work experience and apprenticeships.



Goal 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.

15.5 Protect biodiversity and natural habitats

The interconnected nature of businesses and ecosystems means that companies are dependent on the services that ecosystems provide, namely provisioning services (e.g. freshwater, fibre, and food) and regulatory services (e.g. climate regulation, flood control, and water purification). However, over the past 50 years, 60% of the world's ecosystem services have been degraded – deforestation alone causes annual losses of \$2-5 trillion in ecosystem services. These local impacts can have global consequences, posing both risks and opportunities to businesses.

Businesses have a fundamental responsibility to protect these ecosystems that we rely on. By measuring, managing, and mitigating the impact and dependence we have on land and ecosystems, we can preserve natural resources and ensure long-term socio-economic growth.

Given the proximity of our Stanlow refinery to a site of biological importance and our acknowledgement of EET Fuels' dependence on natural ecosystems, our work with Cheshire Wildlife Trust at Gowy Meadows is essential in contributing to the protection of biodiversity and natural habitats. We support the continued protection and management of over 160 hectares of land which is home to over 150 species of birds, and an abundance of insect and plant species. Additionally, we pride ourselves on providing an area for the local communities to explore and experience the nature we preserve.

Our decarbonisation journey

EET Fuels is committed to becoming the UK's first low carbon process refinery, supporting the nation's Net Zero 2050 goals and setting the standard for process refinery decarbonisation globally. Our ambition is to reduce our operational carbon emissions by 95%, compared to a 2023 base year by 2030.

The transformation of our Stanlow Manufacturing Complex to become a large energy transition hub will be facilitated by a combination of fuel switching and energy efficiency measures all supported by unrivalled infrastructure, expertise, and EET Fuels' large land bank (c.900 acres).

Over the last four years, approximately £100 million has been invested in refinery decarbonisation projects, with an estimated investment pipeline of £1.2 billion planned by 2030.

Our decarbonisation ambitions will require a reduction from our current 2023 base year of 2.1 million tonnes per annum (MTPA) to 0.1 MTPA, a reduction of nearly 2.0 MTPA. We estimate 1.1 MTPA of tCO₂e savings to come from hydrogen fuel switching, utilising hydrogen from EET Hydrogen, as well as other low carbon energy efficiency projects such as the electrification of processes leveraging a hydrogen-ready combined heat and power plant (CHP). The remaining 0.9 MTPA of emissions will be reduced through industrial carbon capture ('ICC'), with investment from the UK Government under the UK's industrial carbon capture business model.

While we understand this is an ambitious goal, we also understand our responsibility as a leading player in the decarbonisation of the UK economy and a key component of the UK's energy security which will depend on cost-efficient, reliable fuel sources for years to come.

Key decarbonisation projects

Hydrogen & energy efficiency

EET Hydrogen Power – hydrogen-ready, multi-fuel combined heat and power (CHP) plant

We currently generate our own steam and power from our existing combined heat and power plant, but in doing so, import a small amount of grid electricity.

The planned, new CHP, one of the world's first hydrogen-ready, multi-fuel enabled CHPs, will replace our existing CHP to rebalance our future steam and power needs – generating power from high efficiency hydrogen gas turbines instead of traditional, inefficient steam turbines.

This will enable us to all but eliminate our need for grid-based electricity, thus eliminating our Scope 2 emissions.

Crude distiller furnace switch to hydrogen

The first hydrogen-ready furnace installed at any UK refinery will be at our Stanlow site. The furnace will be capable of running on 100% hydrogen – with plans to utilise hydrogen from EET Hydrogen's production plant.

Other energy efficiency projects

Fuel switching will also be a priority through retrofitting, enabling hydrogen from EET Hydrogen to replace fossil hydrocarbons across EET Fuels' process fired heaters.

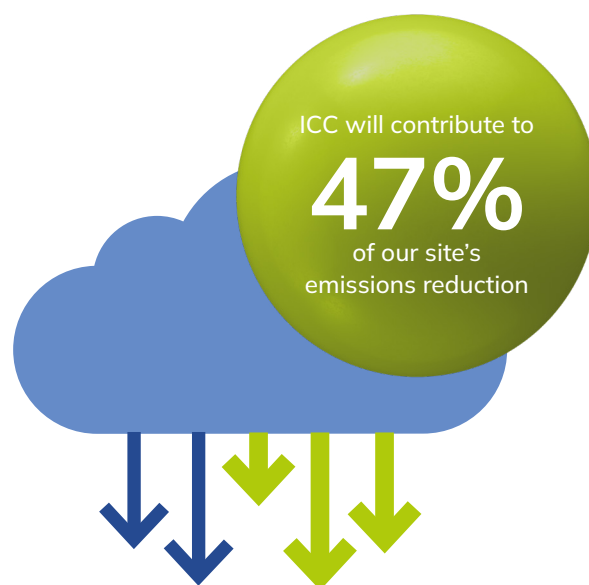


Industrial carbon capture

Plans for industrial carbon capture (ICC) have an estimated 47% contribution to the site's emissions reduction. We have submitted our ICC project to Government for support under the UK's industrial carbon capture business model.

Key to our ICC efforts is carbon capture from our Fluid Catalytic Cracker ('FCC'). Stanlow has one of the largest full residue FCCs in Europe. It will be imperative for EET Fuels to capture the carbon from the FCC unit and store it, which will be achieved by leveraging the carbon capture transport and storage infrastructure being developed by ENI as part of HyNet.

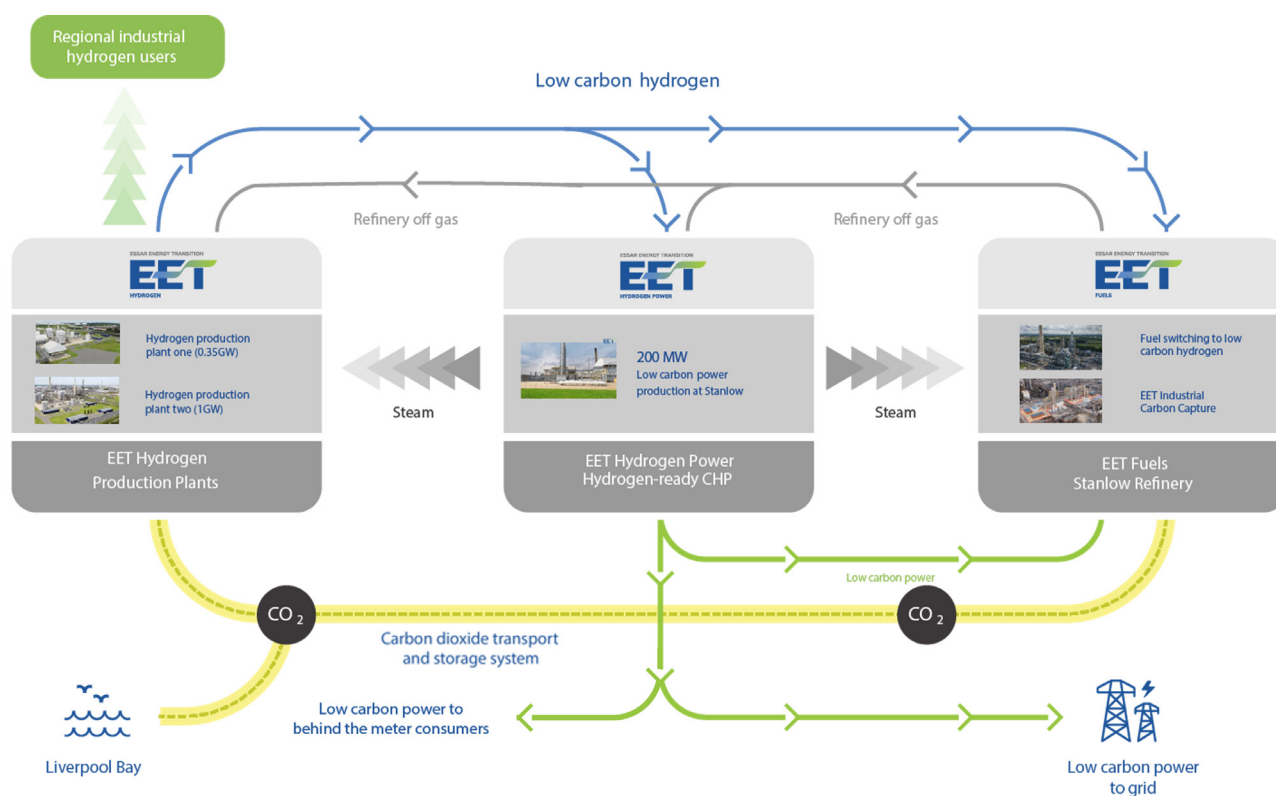
The positive environmental impacts of this project will include a significant reduction in particulate matter and reduce major pollutants, namely SOx and NOx. This delivers the benefit of both reducing emissions and improving air quality.



Decarbonisation progress to date

EET Fuels continues its strong decarbonisation momentum, having made significant progress towards a number of projects. No changes have been made to the anticipated deadlines.

In August 2024, EET Fuels progressed to the front-end engineering design (FEED) stage for our Hydrogen Fuel Switching project. As part of this, we appointed Wood to carry out the project's FEED package. Completion of the FEED will enable EET Fuels to take the final investment decision on the project. In September 2024, we also progressed to the FEED stage of our industrial carbon capture (ICC) project for which we have appointed Toyo Engineering India Pvt. Ltd. Completion of the FEED stage will enable EET Fuels to take the final investment decision on the project, with completion of the ICC project expected in 2028.



Synergised low carbon production processes of EET businesses

Our role in the nation's energy security

EET Fuels is a key player in the UK's energy transition, strengthening national energy through domestic energy production, diversified energy sources, improved efficiency, strategic reserves, and innovation. Underpinning all our investments is our commitment to unrivalled infrastructure, providing multifaceted connectivity opportunities across the UK to facilitate energy security.

Located on the Mersey Estuary within the Port of Liverpool, our facilities are offered for all berth and jetty requirements. This critical infrastructure location also provides the option to import biofuels.

Our marine facilities provide global access to both our Tranmere site, on the River Mersey, and Stanlow site, on the Manchester Ship Canal. Alongside this, we operate Europe's largest multi-product road terminal, providing easy access to the UK motorway network. Our unique location also provides industry leading connectivity via the UK Oil Pipeline network to Kingsbury, Northampton, London, and the Southeast.

Our plan is for all our sites to be operated to the very highest safety and environmental standards, protecting customers, colleagues, communities, and the environment.



Hydrogen and low carbon hydrogen production and transport

In March 2023, EET Hydrogen was selected as a Track-1 project, part of the UK's Carbon Capture, Usage, and Storage (CCUS) Cluster Sequencing Process. In February 2024, the company agreed a statement of principles with the UK Government – an agreement milestone between the company and Government on key aspects of negotiations. We intend to construct low carbon hydrogen production plants at Stanlow, supporting a hydrogen economy across Northwest England and Northeast Wales.

A planning application for the hydrogen plants was approved by Cheshire West and Chester Council in January 2024. Discussions are ongoing with the UK Government regarding a second hydrogen production plant, with an application having been submitted as part of the Track One Expansion Programme. This additional plant would secure 1 GW of hydrogen production capacity.

We are also developing a robust infrastructure system for the storage and transportation of hydrogen via pipelines, road, rail and ship.

Biofuel development and storage

Within the EET group of companies, and as part of our Stanlow refinery site, is Stanlow Terminals Limited (STL). The company is located in one of the largest energy transition hubs in Europe, and is amongst the UK's largest bulk liquid storage and energy infrastructure providers, today and for a low carbon future.

Investments in biofuels storage include the delivery of 300,000 cubic metres of capacity to support customers in delivering the UK's net zero transition. This will allow customers to store, blend, and distribute suitable biofuels as a drop-in replacement for road, aviation, and marine transport. Fuels include sustainable aviation fuel, bioethanol, biomethanol, biodiesel, renewable diesel and sustainable hydrotreated vegetable oil.

To achieve our commitment to 'storage excellence' whilst ensuring the sector's bulk liquid storage needs are met, an extensive asset base is combined with leading edge technology, supply chain expertise and extensive infrastructure. This uniquely positions the company to provide safe, sustainable, eco-friendly, and simplified supply chain solutions.

Additionally, we have signed a memorandum of understanding with ENI, an integrated energy company, to explore the development of CO₂ collection, shipping, and storage, delivering CO₂ into ENI's transport and storage infrastructure currently being developed in the Northwest. We are also evaluating opportunities to connect multiple emitters with ENI UK's licenced storage facility.

Our greenhouse gas emissions

EET Fuels develops and discloses an annual greenhouse gas (GHG) inventory, comprised of our Scope 1 and Scope 2 emissions. This reporting meets the requirements of the Streamlined Energy and Carbon Reporting (SECR) regulations for EET Fuels operations in the UK. These full disclosures can be found in our annual report.

From the period of April 1, 2023, to March 31, 2024, our total combined Scope 1 and 2 gross GHG emissions were 2.06 million tonnes on a CO₂ equivalent basis (tCO₂e), an increase of 6.4% compared to the period from April 1, 2022 to March 31, 2023.

This increase in emissions was due to a shut down in 2022 to enable significant maintenance and statutory inspections to take place across the site. During this period, there were notably reduced levels of production which impacted emissions.

Our Scope 1 emissions have increased by 6.7% since the previous year. We plan to significantly decrease our Scope 1 emissions in the coming years as we switch the feed fuels for most of our high-emitting equipment to hydrogen and leverage carbon capture to reduce emissions from our catalytic cracker.

Being the world's first low carbon process refinery, in terms of Scope 1 and 2 emissions, and our location within the HyNet cluster, can make Stanlow an ideal location for investment in Scope 3 decarbonisation.

Our Scope 2 emissions decreased by 24.4% compared to last year. Additional Scope 2 reductions will occur when our hydrogen-ready combined heat and power plant comes online.

Our plans to reduce our Scope 1 emissions will support our suppliers and customers to achieve their Scope 3 ambitions through the decarbonisation of our production processes

Additionally, being the world's first low carbon process refinery, in terms of Scope 1 and 2 emissions, and our location within the HyNet cluster, can make Stanlow an ideal location for investment in Scope 3 decarbonisation.



Our climate management

EET Fuels reports on our climate-related risks and opportunities, as well as our climate strategy, governance, risk management approach, and associated metrics and targets – known as our climate-related financial disclosure (CFD) reporting – in accordance with the Companies (Strategic Report) (Climate-Related Financial Disclosure) Regulations 2022, Sections 414C, 414CA and 414CB of the Companies Act 2006 (the Act). These full disclosures can be found in our annual report.

Our decarbonisation journey is intertwined with the risks and opportunities that climate-change brings. As such, responding to and managing our climate-related risks and opportunities is an explicit element of our strategy and business model and is inherent to our risk management and governance approach.

Our CFD reporting is consistent with the recommendations from the Taskforce on Climate-related Financial Disclosures (TCFD) and are therefore aligned to the four pillars of Governance, Strategy, Risk Management, and Metrics & Targets.

CFD reporting snapshot

Governance

Our Board provides strategic oversight and governance of EET Fuels' climate-related risks and opportunities and is supported by our Audit and Risk Committee and our Health, Safety, Security, and Environmental (HSSE) Committee.

The Board is responsible for decision making and reviewing our strategy in line with identified climate-related risks and opportunities and setting the future strategic and financial direction of the Company to ensure we are addressing the climate-related needs and expectations of our stakeholders.

Risk management

EET Fuels has integrated the assessment of climate-related risks and opportunities into its overall risk management process whereby climate-related risks and opportunities are treated in the same way as traditional risks that have the potential to severely affect our business.

The table below shows our material climate-related risks and opportunities developed by our Audit & Risk Committee split up by climate-related risk and opportunity type (i.e., physical or transition) and impact category (i.e., how the risk impacts our operations). Additionally, the risks have been categorised by timeframe where:

- Short-term = up to 2030;
- Medium-term = up to 2050; and
- Long-term = up to and beyond 2080.

Climate-related risk & opportunity type	Impact category	Description of risk / opportunity	Timescales
Transition – Risk	Financial	Increasing cost of carbon, impacted by policy decisions regarding UK ETS (Emissions Trading Scheme) and approach to free allowances	Short- to medium-term
Transition – Risk	Financial	Increasing cost of mitigation and adaptation activity	Short- to medium-term
Transition – Risk	Financial	Decreasing demand for fossil-based fuels	Medium- to long-term
Transition – Risk	Regulatory / legal	Loss of global competitiveness, through lack of carbon-border adjustment mechanism in the UK	Short-term
Transition – Opportunity	Regulatory / legal	Access to UK Government support for energy transition activity in line with new UK Government clean energy mission.	Short- to medium-term
Transition – Risk & Opportunity	Regulatory / legal	Changing fuels mandates, including the Renewable Transport Fuel Obligation and the sustainable aviation fuel mandate	Short- to medium-term
Physical – Risk	HSSE	Impact of climate change on operational assets	Medium- to long-term
Transition – Risk	HSSE	Increasing regulatory and environmental compliance costs	Medium-term
Transition – Risk	Reputation	Increasing focus and expectations for financial institution with regard to ESG performance which may lead to difficulties in accessing funds and higher cost of capital	Short- to medium-term
Transition – Risk	Reputation	Diminishing reputation as a fossil-based chemical and fuels manufacturer and supplier	Short- to medium-term

These risks have been informed by a Climate Change Risk Assessment (CCRA) for the Stanlow and Tranmere sites to assess impacts to operations, assets and supply chains that could be exacerbated as a result of global warming and changing climatic conditions.

Insight

Climate Change Risk Assessment (CCRA) for the Stanlow and Tranmere sites:

The CCRA identified the climate trends and hazards that are likely to be experienced at the Stanlow and Tranmere sites in the short, medium and long term, as defined above.

Although projections of future climate are inherently uncertain, the data is based on the latest UK Climate Projection (UKCP18) data from the Met Office. This suggests that both sites are likely to experience warmer, wetter winters and drier, hotter summers with more frequent and severe extreme weather.

For the future baseline, the UKCP18 projections have been used to analyse future changes in a range of climate variables that may affect the resilience of the sites to climate change. The Climate Risk Indicators (CRI) developed as part of the UK Climate Resilience Programme have been used to inform this assessment. The CRI utilises the UKCP18 projections and allows for a range of climate related indicators to be assessed.

The future climate scenarios are based on Representative Concentration Pathways (RCP) to model and project future climate. The assessment considers both a high emissions pathway representing a potential future which is slow to transfer to low carbon energy provision, and a medium stabilisation pathway. By incorporating timeframes and two climate

scenarios, the climate projections will span a representative range of plausible future conditions and provide a more useful representation of uncertainty. A scoping exercise identified the physical assets, operational activities, key supply chains and surrounding environmental receptors related to the Stanlow and Tranmere sites that could be impacted by climate change.

The risks identified by the climate change adaptation risk assessment were assessed on a five-point scale (very low – very high) using a scoring matrix considering the vulnerability of the receptor to the climate impact, the impact likelihood, and the impact consequence. Impact consequences included those with Major Accident Hazards (COMAH), Environmental Permitting Regulations (EPR) and site reliability impacts.

It concluded for Stanlow:-

- Short-Term: all risks identified were either very low (96.9%) or low (3.1%).
- Medium-Term: all risks identified were either very low (91.6%) or low (8.4%).
- Long-Term: a small number of medium risks (3.7%) and the remainder were either very low (81.5%) or low (14.8%).

The risks identified at Tranmere were in similar proportion.

The medium risks identified relate to the impacts of heavy rainfall and flooding, heatwaves and potential for coastal erosion.

Strategy

The actual and potential impacts of the identified climate-related risks and opportunities, as well as their impact on the resilience of our business model and strategy, have been assessed based on the Impact Categories and summarised below.

Financial

Fluctuations of crude oil process, petroleum products and refining margins with decreasing demand of fossil-based fuels, caused by changing preferences to cleaner energy, has the potential to result in a significant adverse impact on our revenue and business model. However, we are mitigating this risk through optimising our feedstocks and sales mix and ensuring the introduction of blending fuels and biofuels, as well as accessing new and emerging markets – namely hydrogen.

Regulatory / legal

As a producer of fossil-based fuels and chemicals, we face a number of regulatory and legal climate-related risks and opportunities which we continue to adapt to – such as the evolving requirements under the Renewable Transport Fuel Obligation, UK Emissions Trading Scheme, and Sustainable Aviation Fuel mandate coming into effect in 2025.

While these changes pose risks to our business, we welcome them as opportunities to address industrial decarbonisation while continuing to supply the fuels and chemicals required by the market today. EET Fuels is deploying mitigation and adaptation measures to ensure it continues to be the supplier of choice for energy and chemical products as regulatory and legal changes continue to shape new market demands.

HSSE

The physical impacts of climate change pose a risk to our critical infrastructure. The inability to safely and effectively operate our refinery and the physical assets that we depend on could result in adverse

financial impact caused by potential major accident hazards. Additionally, EET Fuels acknowledges that climate-related risks may increase the risk of environmental breaches, which could increase compliance related costs and have reputational and operational impacts.

While we have assessed that these climate risks to our Stanlow and Tranmere sites are relatively low over the short-, medium-, and long-term, we have developed adaptation plans and carry out our COMAH risk assessments with due consideration to when and how physical climate risks may materialise.

Reputation

As a major operator in the energy industry, traditionally focused on high-emissions and associated climate impacts, we acknowledge that we face reputational climate-related risks. Additionally, increased expectations

from stakeholders, including customers, suppliers, and particularly financial institutions on ESG performance and shifting to the low carbon economy places additional scrutiny over our operations and strategic priorities.

However, we believe that we are mitigating these risks through several large initiatives, namely the decarbonisation of our Stanlow site, our participation in HyNet and our investments into low carbon alternative products such as hydrogen.

Reputational risk will always exist as we continue to produce fossil fuel-based products to ensure Britain's energy security, though we are confident that our approach to decarbonisation of our operations and ultimately our downstream products will enable us to be seen as leaders compared to our peers.

Insight

Actual / potential impacts and analysis of the resilience of our business model and strategy

As part of the CCRA, an adaptation assessment was completed. Adaptation is defined as the “process of adjustment to actual or expected climate and its effects, in order to moderate harm or exploit beneficial opportunities.”

The adaptation plan and subsequent implementation strategy delivers a response to the impacts identified in the physical risk assessment to appropriately safeguard the assets, operations, staff, and supply chains of Stanlow and Tranmere for future longevity, therefore, ensuring that we are best positioned to cope with future stresses and operational disruptions. In addition to supporting resilience of our infrastructure, operations and staff, the adaptation options can yield new business opportunities and / or savings from improved process efficiencies.

The majority of the risks identified are existing business risks, for example surface water flooding, where the impact of climate change is to increase the frequency of occurrence. For these risks, there are currently identified mitigations and measures in place.

The adaptation assessment identified a number of further measures which could be implemented to improve climate resilience – the majority of these are considered as simple and inexpensive to implement.

It is considered that the CCRA and adaptation assessment demonstrate that the sites would not see a significant impact on operations taking into consideration of different climate-related scenarios and therefore that the business model and strategy of the company is considered resilient to the physical effects of climate change.

Metrics and targets

The risk assessment for HSSE risks, adaptation plans, and implementation strategy will be incorporated into the existing COMAH strategy and into the site Environmental Management System (which is ISO14001). Key Performance Indicators (KPIs) which will be tracked are existing KPIs relating to COMAH and EPR barriers and compliance.

Our management of environmental impacts

Biodiversity management

Located between Stanlow Manufacturing Complex and the M56 motorway, Gowy Meadows hosts a wealth of biodiversity. The site, owned by EET Fuels and managed by the Cheshire Wildlife Trust, serves as a significant core area for nature. It plays a crucial role in helping the Cheshire Wildlife Trust achieve the 30 by 30 goal – a global initiative aiming for governments to protect 30% of the Earth's land and ocean areas by 2030.

At over 160 hectares, Gowy Meadows is one of the Trust's flagship nature reserves. It hosts an extensive network of wildlife rich ditches, hedgerows, wet grasslands and ponds, all forming part of the flood plain grazing marsh habitat mosaic that covers the majority of the site. The site has over 4km of paths and is open all-year round with activities provided by Chester Wildlife Trust staff and their volunteers.



More than 150 bird species have been recorded at Gowy Meadows and the reserve is particularly impressive for aquatic invertebrates, including the lesser silver water beetle, and is home to more than half of the dragonfly and butterfly species recorded across Cheshire. Excitingly, otters have also returned to Gowy Meadows – a true testament to the value of the conservation efforts at Gowy Meadows.

Cheshire Wildlife Trust has been working to establish new ponds across the reserve, with support from Natural England's Species Recovery Programme. Additionally, several significant habitat creation and restoration projects are underway. Efforts are focused on restoring channels and ditches throughout the central part of the reserve to enhance freshwater habitats and improve flood water management for the winter months.

We are currently developing its biodiversity net gain strategy, working in partnership with our relevant expert local stakeholders. More locally, we have also been working with both external consultants and potential delivery partners, to develop an overarching strategy that simultaneously enhances our engagement with local biodiversity while also supporting future planning applications.



Waste management

We have operating practices in place to minimise waste and to recycle waste materials back into production processes where possible. The site includes an Energy Recovery Plant which generates energy from oil containing waste streams.

All office or household waste is collected by a specialist recovery group who again seek to maximise opportunities for recycling and reuse of materials.

Water management

In line with permits provided under the Environmental Permitting Regulations, EET Fuels reports on water and wastewater use and management on a quarterly and annual basis to the Environment Agency. There is a well-established understanding of the environmental issues relating to water use and disposal. Some examples of this include:

- **Water management:** The refinery's processes use water from several sources. Water usage on site is monitored and reported as part of the environmental permitting requirements. Where possible water is recycled within the refinery processes to minimise the freshwater usage. In accordance with environmental permitting requirements, new projects on site consider minimisation of freshwater use as a part of the design process.
- **Wastewater management:** Wastewater on site is monitored for quantity and quality and reported as part of the environmental permitting requirements. The Group has commissioned a multi-million-pound project to route some of the wastewater to the United Utilities Ellesmere Port Wastewater Treatment works, where it will be further treated to reduce the environmental impact.

Air quality management area

Working with the relevant local authority (Cheshire West and Chester), the Environment Agency and with the Group's fenceline communities, the Group has successfully delivered significant improvements to local air quality.

An air quality action plan had been introduced in 2016 and monitoring stations were located in local villages. Since then, air quality incidents have been all but eliminated and there have been no exceedances of the public health limits since 2019. This is a result of significant process improvements that have been made to reduce sulphur emissions. We continue to work with our partners to identify further improvement opportunities, including trialling approaches to remove sulphur. Investments in decarbonisation technologies will further improve performance.

Indications from the local authority suggest that they are satisfied with the work undertaken to address the air quality exceedances. EET Fuels and the local authority are now working together to progress closing the Air Quality Management Plan.



"Working collaboratively with the local community is a priority for the Group as it recognises the significant contribution and impact that operations can have on them."

Social stewardship

Overview

EET Fuels holds itself to a high standard regarding our social values. We work to be a safe, inclusive, and caring organisation, focused on the needs of our employees and our communities.

The Social stewardship section of our ESG report describes our approach to identifying and delivering activity which is in the best interests of society, and which meets the wider expectations of our stakeholders.



This section includes:

- SDGs and our social stewardship
- Our safety commitment
- Our community focus
- Our giving nature
- Our people, our priority

Sustainable Development Goals

and our social stewardship



Goal 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all

4.4 Increase the number of people with relevant skills for financial success

Education is considered as a fundamental human right as per Article 26 of the Universal Declaration of Human Rights. Businesses are uniquely positioned to support learning and development throughout the educational and professional journeys of individuals. Not only is a highly educated workforce essential for achieving climate goals, such as Net Zero and the energy transition, but it is also a key factor in the success of individuals no matter their vocation.

EET Fuels actively supports development and education through engagement with students from primary school through to graduation, especially in the communities near our facility. We support, encourage, and foster a passion for learning among all students we work with and provide our employees with the opportunities to engage with local schools. This priority for continued learning continues at EET Fuels with our work experience, apprenticeship, and continued learning programmes to ensure we continue the educational process even after individuals leave school.



Goal 5: Achieve gender equality and empower all women and girls

5.5 Ensure full participation in leadership and decision making

Gender equality forms a basic and inviolable human right including the empowerment of women and girls essential to economic growth and promoting social development. Investment into women's empowerment yields additional benefits for children, making a fundamental contribution to the health and social development of families, communities, and nations. Corporate organisations have the opportunity to support women and girls in the workforce and positions of leadership.

As we operate in an industry that has been known to perform poorly in gender diversity and representation, with women accounting for only around 20% of the oil and gas labour force, with around 32% in the renewable energy workforce*, we recognise our responsibility to make a difference – no matter the size. Our Women's Leadership Programme focusses on providing opportunities for leadership and mentoring, as well as through positive recruitment. This is not an issue we believe can simply sort itself out and we continue to strive to empower and encourage women in our workforce to grow and develop, as we also aim to increase the representation of women throughout our workforce.

* Gender diversity in energy: what we know and what we don't know – Analysis - IEA

Our HSE commitment



Given the inherently hazardous nature of our operations, we are mindful of the potential for serious injury and are committed to the continuous identification and management of risk. We recognise that incidents of serious injury to any individual would affect our people. We also understand that any environmental incident would not only adversely affect the local environment and communities around us, but harm our reputation as a responsible operator.

EET Fuels has a formal Health, Safety and Environmental ('HSE') policy, with related HSE management systems in place. These are communicated to employees and to relevant business partners and are supported by training which is provided on a regular basis. Regular reviews are carried out to ensure compliance with the HSE policy.

We are currently in the process of transitioning to a new Business Management System which incorporates our Health, Safety, Environment Management Systems ('HSE-MS'). This is complemented by adherence with regulatory requirements. The directors ultimately monitor the effectiveness of the various HSE policies and systems through the HSSE (Health, Safety, Security and Environment) Sub-Committee of the Board. We share external reporting with organisations ranging from regulatory, through to industry bodies, and our wider stakeholders. We also report performance to the Environment Agency on a quarterly and annual basis where performance relates to permits issued under the Environmental Permitting Regulations.

Our Business Management System (BMS)

The Company's BMS is premised on the basis that effective management of health, safety, environment and major accident hazards requires a systematic approach with appropriate governance structures in place. It requires that every employee has clearly defined and unambiguous accountabilities that must be met to achieve its objectives.

The Management System is hierarchical, and its content aligns the ten elements set out in ISO 14001 (2015) and the ISO 45001. The BMS has been accredited to ISO 14001 and ISO9001 since 1999.

The Control of Major Accident Hazards Regulations – the regulatory oversight process for our safety performance

The Control of Major Accident Hazards (COMAH) Regulations provide the regulatory oversight of the process for safety performance at our sites. This is a form of management system and enables us to demonstrate that we can safely and adequately control major accident hazards.

Oversight of our approach to HSE is provided by the HSSE Sub-Committee of the Board. The HSSE Committee has set several leading and lagging key performance indicators for the business in subject areas like HSE Triple Goal Zero performance, Lost Time to Injury (LTI), personal safety, process safety, regulatory issues and asset integrity. We have also put plans in place to deliver performance improvements.

We also participate in combined industry / regulatory working groups which are developing best practices and currently chair the Fuels Industry UK process safety leadership network. This is part of a commitment to improve process safety performance across the whole sector.



Engaging our employees in HSE

The health, safety and wellbeing of employees is a primary consideration in the way we operate. There is a continuous process of recognising hazards and assessing health, safety and environmental risks in our operations through audits, risk assessments and review of process performance to take steps to mitigate risks.

As such, a culture of continual improvement is fostered, HSE performance is benchmarked and best practice in HSE is adopted. This ensures that learning from incidents is embedded into our management system. In addition, weekly safety standstills are conducted to share best practices and to ensure that lessons are learned from any incidents. From this we ensure that changes are made to our policies, procedures, and organisational behaviours accordingly.

Our community focus

Through our community programme, EET Fuels aims to be a catalyst for positive change in society. Working with and supporting our local communities through partnerships with agencies and charities, community-focussed initiatives are delivered in line with our programme themes of education, environment, wellbeing and community.

Education

Our educational programme provides support to children from a range of backgrounds and stages in their academic life. Our educational programme is focussed on providing engagement and education from primary school through to our apprenticeship and work experience programmes, supporting the learning and development of our community and ensuring financial success through placements at EET Fuels.

EET Fuels also provides our employees with opportunities to spend time in local schools to give back to the community, support life-long education and future success, and develop the sustainability leaders of tomorrow. We sponsor, support, and participate in festivals and STEM programmes, such as Mad Science and the Green Expo, as well as providing guidance to aspiring professionals through career fairs. Additionally, this year, our recruitment team visited several local universities to conduct mock interviews with students.

In September 2022, a new programme of activity was developed in partnership with Passion for Learning. Aimed at supporting children from more deprived communities, our support funded an enrichment club at a primary school which is located close to Stanlow Refinery. This enrichment club continues to run weekly for 33 weeks across the school year.

We continue to support the Fred Venables Higher Education Trust which supports students most in need with grants during the critical period as they transition from school and home to further and higher education. This focussed support is for students from challenging backgrounds. Grants average £1,000 and in February, eight students received grants from the Trust. Students benefitting from this funding come predominantly from Whitby High School, Neston High School, Ellesmere Port Catholic High School and Ellesmere Port Church of England College.



"Our educational programme is focussed on providing engagement and education from primary school through to our apprenticeship and work experience programmes."

Environment

Protecting the natural environment is more important than ever and we support the Cheshire Wildlife Trust by providing a base for them at the EET Fuels-owned Holly Bank House and Gowy Meadows woodland area. This spring, work with them provided a range of activities for over 130 children and teachers to learn about protecting and working with the natural environment. Each activity was linked to either the Science or Personal, Social, Health, and Economic (PSHE) curriculum for the relevant year group and follow-on visits took place with schools to embed the learning.

Cheshire Wildlife Trust also delivered Family Woodland Experience Sessions to our employees and a number of families took part in this woodland activity.

Wellbeing

Wellbeing is a key priority across all parts of society, and we understand the important role that wellbeing plays in work and home life. Wellbeing covers a broad range of topics, including financial wellbeing, mental or physical health, and personal relationships. As such, employees can access free confidential help with professional consultants and associated resources for almost any issue.

EET Fuels' experienced Occupational Health Team proactively manages programmes designed to support the health and wellbeing of employees. This includes monthly wellbeing advice information, one to one support and direct interventions to respond to emerging themes or issues.

We also recognise the impact that physical health can have on mental health, offering employees the opportunity to take up cycling as part of a Cycle2Work scheme. This also aligns with the UK Department for Transport's own Green Travel Plan. In 2024, 29 employees became part of the scheme, taking the total number to 49.

Additionally, we support the Chester Half Marathon, and it was great to see around 4,000 runners, including around 50 of our employees, participating in this year's event. The event also includes a Family Fun Run which encourages children to engage with sport. The half marathon follows the EET Fuels-supported Four Villages Half Marathon which sees 1,500 runners each year pass close by our site as they complete their 13-mile course.



Community

Working collaboratively with the local community is a priority for EET Fuels; we recognise the significant contribution and impact that our operations can have on them. In order to provide the community with the opportunity to express their concerns and ensure opportunities are developed in a collaborative way, biannual Community Liaison Panel meetings are held, with parish councils of fenceline communities, local councillors, the local authority, the regional teams from our regulators and our Member of Parliament.

Representatives of EET Fuels support the Ellesmere Port Development Board which brings businesses, the local authority, public sector representatives, and charities together to support the development of Ellesmere Port. The Board recently collaborated in launching the Origin brand with Cheshire West and Chester council which celebrates and demonstrates the investment opportunity associated with the Ellesmere Port Industrial Zone. There is a business group that meets quarterly to discuss matters of interest. From this, skills, transport, and engagement workstreams have been developed to address issues more closely.

We are proud shirt sponsors of Tranmere Rovers Football Club; this partnership also reaches into the local community where we regularly collaborate with the club's registered charity 'Tranmere Rovers in the Community' to deliver its community outreach programme and initiatives.

Last Christmas, we also continued our support for the Super White Christmas appeal in partnership with Tranmere Rovers Football Club, ensuring that local people have access to a Christmas meal and celebration. Super White Christmas 2024 included food hamper deliveries, Christmas parties (for both children and adults), a Christmas dinner for care leavers and matchday experiences.

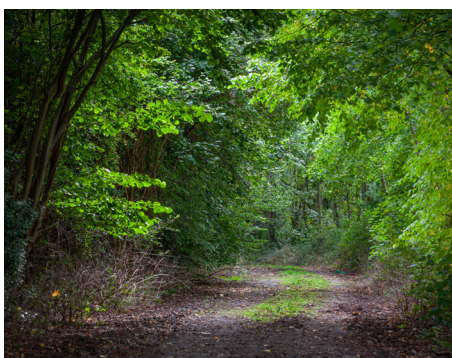
Our giving nature

We have an established record of supporting causes across the region and contributed to 19 different projects last year from our community fund, compared to 14 projects in the previous year. Applications to the funds are made by local organisations that deliver programmes which:

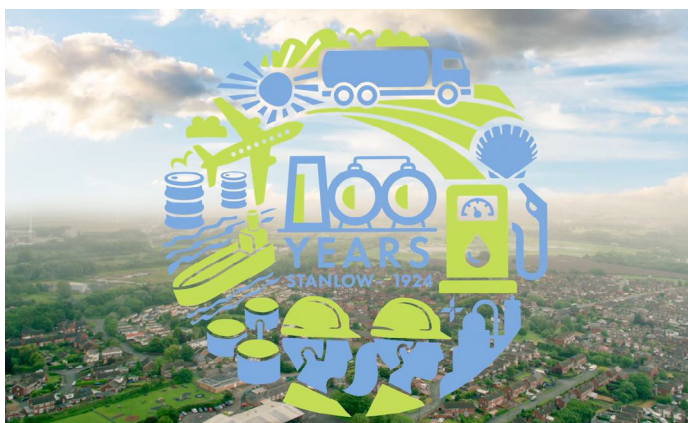
Support wellbeing, education, community and environmental initiatives



Support activity in our fenceline communities



Support those causes that are valued by our colleagues



It is crucial that the business which has such a prominent footprint in the community gives back in ways that it can. This community fund enables the Group to give back to worthy causes, on its doorstep, that improve people's lives every day and which are valued by its colleagues.

In June 2024, applications opened for the Stanlow Refinery Centenary Grant Fund, a new £100,000 grant fund launched to celebrate the refinery's 100th anniversary. Grants range from £500 to £1,000 with applications being judged on their potential to make a positive impact on the local community. The fund was open to applications from registered charities and not-for-profit organisations working in the following areas:

- Education and skills development
- Environment and sustainability
- Community health and wellbeing
- Culture and heritage

Our people, our priority

Recruitment and development

EET Fuels has a monthly average number of 1041 employees (including Executive Directors) represented by two groups – salaried and trade union employees.

EET Fuels recruit individuals who are enthusiastic and focussed on operational excellence and serving our customers, as well as having the potential to progress through internal career opportunities.

Full consideration is given to applications for employment from people with disabilities where the requirements of the job can be adequately fulfilled by a person with a disability, and we provide on-going employment, wherever practicable, to employees who may become disabled during the course of employment and provide training and career development programmes for those with disabilities.

Employee development is monitored by way of continual assessment and appraisal and we have introduced a behavioural competency-based employee performance management system. Training is available to all employees and financial assistance is given to employees wishing to pursue professional qualifications to provide opportunities for advancement. Financial assistance is provided based on an individual development need.

Recognition

A formal recognition agreement is in place with the trade union, Unite the Union. Meaningful engagement between EET Fuels and Unite the Union is underpinned by the appointment of elected representatives. The agreement commits the Group to the establishment of regular forums, attended by the Executive Leadership team and senior Unite stewards.

Colleagues not included in the collective agreement are represented through our Employee Forum. The Employee Forum representatives also have regular meetings with the Executive Leadership Team.

The work done together through these channels develops the relationships required to deliver strong operational performance and to enable Stanlow to become an energy transition hub.

Our SRA (Special Recognition Awards) scheme offers managers the opportunity to award colleagues from within their own team or elsewhere across the organisation with vouchers. Between April 2023 and March 2024, 186 SRAs were awarded totalling £14,625. In January 2023 we also launched our NICE (New Ideas Change Essar) scheme – a staff suggestion scheme where employees can be awarded up to £5,000 should their initiative be implemented.

Engagement

The Executive Leadership Team ensures that employees receive engaging information about the Group's activities, plans, and performance. These communications also provide an invaluable opportunity for employees to ask questions directly of the Executive Leadership Team.

There has been a step change in colleague engagement during the year, with highlights including the re-introduction of our Town Hall events, sporting events, and long service celebrations. Colleagues were also able to attend a variety of events that supported development, networking, education, and community building. Our Town Hall events occur every six months, with two thirds of EET Fuels' employees in attendance – these are livestreamed for those who cannot attend. Trade union and employee forums occur regularly. We also facilitate "huddles" – with an attendance of around 100-150 people, these serve as an informal setting in which to discuss specific issues as they arise.

There was also an increase in our online engagement with colleagues through the introduction of a weekly 'News to know, this week' colleague newsletter which keeps staff informed on updates across EET and engaged with the events taking place at work. This complements the long-established weekly refinery updates from the Chief Operating Officer and regular business updates from the Chief Executive Officer. The introduction of digital noticeboards across the site provides an effective and engaging way to keep colleagues up to date and share strategic developments with them.



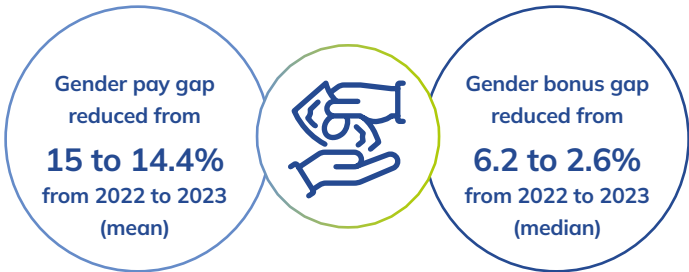
Pensions

The Group maintains a closed final salary defined benefit pension scheme for employees who commenced direct employment at Stanlow before 1 August 2011 and a defined contribution scheme for all eligible employees within the Group, including employed deferred members of the defined contribution scheme and those who commenced employment on or after this date.

- **Defined Contribution Scheme:** The Group's defined contribution scheme is operated by Aviva for the benefit of all employees who commenced work with the Group on or after 1 August 2011. Following the closure of defined benefit scheme for any future accrual, all eligible employees are now benefited under the defined contribution scheme.
- **Defined Benefit Scheme:** This scheme has now been closed for any future accrual as at 1 January 2022.

Women's leadership programme

EET Fuels recognises and welcomes our responsibility to support women in our workforce. Our industry has historically been male-dominant; therefore, we are actively supporting the inclusion and empowerment of women in our workforce.



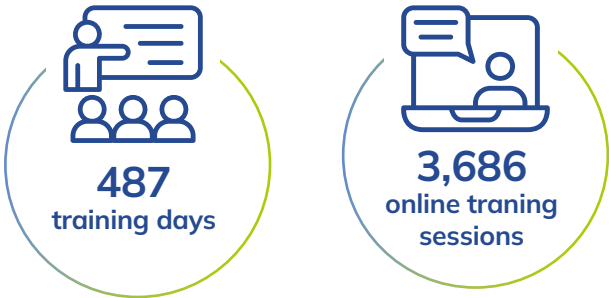
Whilst we are proud of the work we have done to date to increase that number, we continue to leverage our positive recruitment ethos to attract women to our industry. We also provide support for women in the workplace through a women's network group and leadership programme and we are identifying and addressing any elements of our recruitment processes which may limit the progression of women, taking action to address any hurdles.

This programme has been instrumental in making changes to our flexible working practices and improving representation in our executive and senior leadership teams through key appointments and memberships to Women in Leadership for mentorship and leadership opportunities.

We continue to make progress to close the gender pay gap and this is reflected in our most recent Gender Pay Gap report. Both the mean and median gender pay gap have reduced from 2022 to 2023 – from 15% to 14.4% for the mean and from 14.5% to 5.1% for the median. The same proportion of men and women within the Group (88%) received a bonus, with the mean and median gender bonus gap also decreasing from 2022 to 2023 – from 27.7% to 18.3% for the mean and from 6.2% to 2.6% for the median.

Training and development

EET Fuels values and supports the ongoing development of all employees. Employees take ownership of their learning and development with comprehensive support throughout the process. Development opportunities are focused on enabling employees to be able to demonstrate the competences required to carry out their current and future job roles, based on a planned, organised, and positive approach.



Colleagues completed 487 training days, and 3,686 online training sessions were completed in the financial year ending March 2024. Training ranges from essential and professional competency through to leadership development and mentoring. All leaders within our business completed Dale Carnegie Leadership training.

As an operator of two top tier COMAH sites, competence is essential to our operations. This is reflected in the HSE and technical training employees are required to undertake. Important skills and knowledge gained ensure employees consistently demonstrate competence in their roles. Our HSE competencies have been developed to ensure we are safe and meeting regulatory requirements.

Functional competence relates to the technical requirements in each job role and functional competence development is achieved in a variety of ways both on the job and / or via more formal training programmes. Business competence focuses on delivering for our customers and stakeholders and taking the right commercial decisions for the business. Personal competence is pivotal to our success, as it is essential for all staff to build relationships and work with others.

All employees also complete additional mandatory training which addresses workplace behavioural and culture issues including workplace equality and diversity, cyber-bullying, and bullying and harassment. These support our code of conduct and contribute to a positive culture. Future skills planning and preparation is of critical importance to us and for the future of EET Fuels, as well as the energy transition towards net zero. Additionally, we are working with the HyNet Alliance to identify and develop training for the future of the energy sector.



Apprenticeship programme

EET Fuels understands and values the benefit and opportunity that apprenticeship and graduate programmes bring and continues to offer a comprehensive programme. From April 2023 to March 2024, our apprenticeship and graduate recruitment efforts have included careers fairs, panel events and open days. We also undertook community outreach work with a local primary school.

16 graduates joined EET Fuels in 2023 covering disciplines including legal, engineering and finance while 19 apprentices joined in roles including engineering and manufacturing, IT, commercial, legal and business administration.

The engineering and manufacturing apprenticeship programme is delivered in partnership with Training Tomorrow's Engineers (TTE) based in Ellesmere Port. TTE is rated 'Excellent' by Ofsted and provides the following qualifications:

- BTEC Level 3 Science Industry Maintenance technician
- BTEC Level 3 Science Manufacturing technician
- NVQ Level 3 Diploma in process/maintenance engineering

Robust governance

Overview

EET Fuels' approach to governance is rooted in acting with integrity and high ethical standards at all levels of our organisation. We have embedded the Wates Corporate Governance Principles for Large Private Companies into our structures and processes to continue to support good practice and high standards.

The Robust Governance section of our ESG report describes our approach to ensuring our operations, strategy, and culture are aligned to values of honesty, integrity, and professionalism.



This section includes:

- Sustainable Development Goals and our approach to governance
- How we govern
- How we engage
- How we comply

Sustainable Development Goals

and our approach to governance



Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

8.2 Diversify, innovate and upgrade for economic productivity

Businesses play a crucial role in job creation, economic development, and providing safe working conditions that are beneficial for both business and the society. Companies that adhere to labour standards in their operations and supply chains are less likely to suffer from reputational damage and legal issues. Moreover, adopting non-discriminatory practices and promoting diversity and inclusion can enhance access to skilled and productive talent – enabling innovation through diversification.



Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

8.8 Protect labour rights and promote safe working environments

A safe working environment is central to ensuring safe work for all. Health, process safety, and personal safety have been embedded within our organisational culture and policies, as well as forming two of the three focal areas of our Triple Goal Zero initiative (personal safety and process safety). This commitment has the potential to positively impact both employees and company operations over the long-term. Our decarbonisation plans contribute both economic resilience and energy independence for the UK.



Goal 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation

9.4 Upgrade all industries and infrastructures for sustainability

Aging, deteriorated, or inadequate infrastructure, combined with inflexible and non-adaptable processes can create significant challenges for businesses, especially through the energy transition. Global companies can support inclusive infrastructure development by contributing to innovative and resilient processes, procedures, and infrastructure aligned to changing market demands and climate challenges.

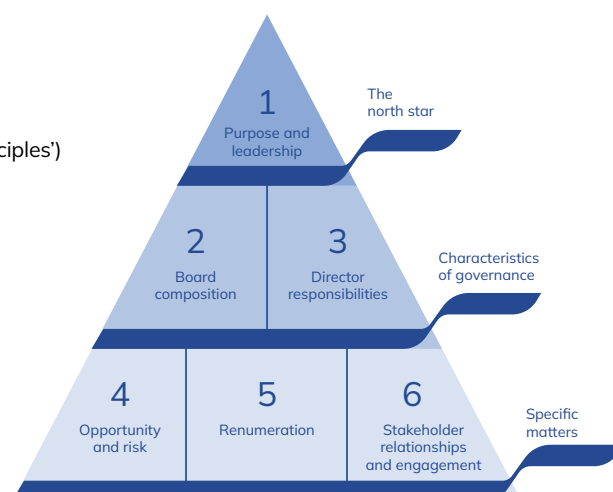
Resilient infrastructure, sustainable industrialisation, and innovation are exemplified in EET Fuels' decarbonisation plans which recognise that our assets and products are core to the transition process - enabling us to not only decarbonise our operations but support the wider supply chain's move to more sustainable, alternative products - all backed by robust policies, procedures, and a commitment to high standards of operation.

The Wates Corporate Governance Principles and our approach to governance

The Wates Corporate Governance Principles for Large Private Companies ('Wates Principles') are published by the Financial Reporting Council (FRC).

Originally issued in 2018, the Wates Principles assist relevant organisations in raising their standards of corporate governance. They provide a reporting structure against which large private companies can fulfil their legal requirements and demonstrate good practice. They are made up of six principles as seen in the diagram opposite.

We are pleased to report that the Group has embedded all six elements of the Wates Principles, with plans to enhance this over the next couple of years to ensure alignment with our annual report.



How we govern

Purpose and leadership

The Group is committed to playing a key role in the decarbonisation of the UK economy, with ambitious plans to build an energy transition hub at our site in the North West of England and to become the UK's first low carbon process refinery. Our vision is 'Performing today – Transforming for Tomorrow' and this aligns with the UK Government's Ten Point Plan on the Green Industrial Revolution and with its British Energy Security Strategy.

The Group forms part of Essar Energy Transition which is playing a major role in accelerating the UK's low carbon transformation, supporting the region's decarbonisation ambitions, and creating highly skilled jobs. Our energy transition plans are underpinned by our Environment, Social and Governance approach.

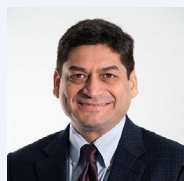
The Board promotes the purpose within the organisation and ensures that the Group's strategy, objectives and culture align with the purpose.

The Board

Our Board comprises one executive director and five non-executive Directors. The individual directors bring a wide range of experience aligned to our purpose, including finance, sales, marketing, HSE and trading, project execution and governance and risk assessment. All director appointments are subject to approval by the Remuneration and Nomination Committee.

A short biography for each Board Director can be found on our Board of Directors webpage.

The Directors are:



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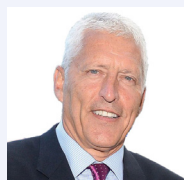
T Bullock



A R H Wright



D K Maheshwari
(Chief Executive
Officer)



M Palios



C A Fountain

The Board meets regularly throughout the year to review performance – with quarterly performance updates provided by Executive Leadership – and deal with matters requiring board approval. It also convenes on a more ad-hoc basis, as required, to manage the business of EET Fuels. The Board is mindful in all of its dealing of the desire for EET Fuels to maintain its reputation for high standards of business conduct and acts, through its Governance processes, to achieve this aim.

Board committees

Certain items of business are delegated to the three principal Board committees: the Audit and Risk Committee; the Remuneration and Nomination Committee; and the Health, Safety, Security and Environment (HSSE) Committee. Each committee operates under clear terms of reference. The Board utilises its committees to assist it in providing oversight, challenge and guidance to the Executive in the areas of risk, audit, remuneration, HSSE and information security. Across the organisation, remuneration is jointly aligned with both organisational performance and individual performance.

Remuneration and Nomination Committee

The Board has established a Remuneration and Nomination Committee. The Committee determines the terms and conditions of service of Executive Directors. The remuneration and terms and conditions of appointment of non-executive directors are set by the Board. Remuneration is designed to be appropriate and fair, to recruit and retain high quality directors, management and workforce.

The committee also sets objectives for performance related incentives, aligned with our purpose and strategic objectives, for Executive Directors and other members of the Executive Leadership Team, and reviews performance against those objectives.

Audit & Risk Committee

The Group recognises the opportunities and risks to the achievement of its objectives and purpose. The Board has established an Audit and Risk Committee with delegated responsibility for ensuring that the financial performance, position and prospects of the Group are properly monitored and reported on. The Committee meets with the auditors and discusses their reports on the accounts and the Group's financial controls and recommends the appointment of auditors. It also reviews the internal controls and risk management processes, including the output from internal audits.

Given potential volatility affecting the sector and the Group, it is necessary for the Group to constantly monitor and evaluate its exposure to uncertainty. To protect the Group from adverse movements it has adopted industry best practices of price risk management.

To manage this, the Board has established a Risk Management Committee (RMC) comprising of the Chief Executive Officer, the Chief Finance Officer, the Chief Commercial Officer and the Chief Risk Officer. The RMC meets as required, usually weekly but not less than monthly, to manage risks including pricing and commodity risk. The Chief Risk Officer manages the assurance and enterprise risk.

HSSE Committee

The Group recognises the health, safety, security and environment (HSSE) risks given the nature of our work. Innovation gives rise to new technologies and processes, presenting new and unfamiliar risks to all stakeholders. To ensure that the risks of health, safety and environment are not overlooked under the pressures of pursuing our objectives, the Board has appointed an HSSE Committee.

The Committee is responsible for providing assistance, recommendations, and reports to the Board, thus facilitating their understanding, reviewing, and monitoring of the Company's strategy relating to HSSE issues, including all HSE major accident hazards. These include, but are not limited to best practice comparators, legal compliance, and HSSE risk mitigation strategies. The Committee is also responsible for the investigation of all serious incidents and reviewing our HSSEQ related policies, strategy, and actions. Committee meetings are held no fewer than four times a year, or otherwise as required.

Our strategy and business plan

The Chief Executive Officer and the rest of their Executive Leadership are responsible for implementing the strategy set by the Board and leading day-to-day operations.

Each year, the Board undertakes an in-depth review of our strategy, including the business plan for the following five years. Once approved by the Board, the plan and strategy form the basis for financial budgets, resource plans and investment decisions, and future strategic direction. Specific business objectives are evaluated on a number of factors, including how they deliver the strategic plan, financial outcomes (using long-term cash flow modelling), and impact on business reputation. The insight provided from stakeholder engagement also informs both strategic and operational decision-making.

Our strategy has evolved to facilitate the ESG priorities of EET Fuels, adopting a proactive approach towards the energy transition and the opportunities it presents.

How we engage

Our value chain is a key aspect of our ESG journey, and we place a high level of importance on engagement with our various stakeholders, at a local, national and international level. Stakeholder engagement is supported and enhanced through membership of and active participation in a number of trade associations.

The Board ensures a dialogue through effective working relationships with all stakeholders who have a material interest in EET Fuels, ensuring that these insights inform both strategic and operational decision making – aligned to our purpose of Performing Today – Transforming for Tomorrow. In engaging with stakeholders, the Board takes a balanced approach and ensures that it acts fairly in responding to the different stakeholder needs. Therefore, EET Fuels has significant relationships with the following stakeholder groups.

Employees

Our employees are key to our operations and their feedback, expectations, and opinions are instrumental our continued ability to operate safely and sustainably. Information on our engagement with communities can be found in the Social stewardship section of this report under 'Our people, our priority'.

Community

We take pride in the positive impacts and engagement we have with our local community. It is a responsibility and a privilege that we strive to improve upon year after year. Information on our engagement with the community can be found in the social stewardship section of this report.

Business relationships (customers and suppliers)

Retaining existing customers, helping to support their growth, and obtaining new customers is a key objective for EET Fuels in delivering our strategy. Our customer base includes supermarkets, major oil companies, commercial bulk users, resellers, aviation companies, and independent retailers – with revenues from our largest customer contributing to approximately 20% of our overall revenues in 2023.

To improve our relationships, we continuously review and enhance our product offering and make multi-year commitments with key customers. Regular interaction with our customers and suppliers through our dedicated teams has been a key differentiator in attracting new relationships.

This year, we launched a new customer proposition for our petrol forecourts business 'Driving Community Convenience' and developed a new 'company-owned, dealer-operated' strategy to deliver growth in our retail business.

We also work closely with our suppliers to optimise supply chains, implement efficient processes, and manage HSE in line with relevant policies. The business is also investing into technological improvements to improve the customer business experience, manage risk throughout our supply chain, and increase operational efficiencies.



Regulators

The oil and gas sector is subject to significant safety and environmental regulation. As such, we continuously monitor regulatory and good industry practice developments to ensure compliance and to maintain good interaction with regulators to gain insight and to contribute positively.

Members of the Executive Leadership Team hold regular update meetings with the regulators, and with representatives of relevant local authority leadership teams.

Working with our regulatory stakeholders, we are committed to sustainable refinery processes and conducting our operations within responsible HSE standards. This includes a responsibility to limit the impact on the environment by mitigating risks, minimising pollution, reducing our environmental footprint, and optimising natural resource consumption. This broad commitment is across a wide range of health, safety, and environmental initiatives and informs our strategic and operational direction and our decision-making processes.



Government (local and national)

Developing effective relationships with national and local policy makers, built on a shared understanding of the one another's ambitions and objectives, is essential to the effective strategic development and day to day operation of our business. In 2024, our approach has been enhanced through engagement with the Indian Government representatives, interested in outward investment.

Members of the Executive Leadership hold regular update meetings with the Department for Energy Security and Net Zero and with the Department for Business and Trade. This has recently been supplemented by engagement with HM Treasury and the Prime Minister's policy teams.

The importance of having an effective relationship in place has been particularly relevant as we manage risk associated with political change. EET Fuels has effective relationships in place with political representatives from across the political spectrum at both a local and national level. The aim in building such relationships is to develop a shared understanding of how policy goals can be achieved.

Engagement has also focussed on the role we play in delivering the ambitions of the UK Government's Green Energy Superpower goal. In February 2024, EET Hydrogen agreed a statement of principles with the UK Government which is an agreement milestone between the Company and Government on key aspects of their negotiations. Engagement also supports the management of our risks. Since the Labour Government's appointment in July 2024, we have observed

a sense of continuity regarding the Ten Point Plan – in October 2024, the UK Government pledged almost £22 billion in funding to support carbon capture projects, including EET Hydrogen's first hydrogen production plant.

We also submitted applications to support the development of an industrial carbon capture facility and a 1GW hydrogen production plan to the UK Government in March 2024 as part of the Carbon Capture, Usage and Storage Cluster Sequencing Process Track One Expansion programme.

We have close working relationships with the members of Parliament who represent the areas of our operations and with representatives of our local authority. Again, by working together day to day issues can be addressed and strategic conversations supported.

Nature

The Gowy Meadows wildlife reserve is a key site to our biodiversity partner Cheshire Wildlife Trust, home to an extensive network of species. The consideration of non-human entities, such as nature and the environment, as silent stakeholders is especially important given the proximity of our Stanlow refinery to a site of biodiversity importance.

Giving nature a 'voice' aligns with regulatory recommendations from emerging ESG regulations that have a biodiversity focus, such as the Taskforce on Nature-related Financial Disclosures ('TNFD'), and Climate Disclosure Standards Board ('CDSB'), and the EU's Corporate Social Responsibility Directive ('CSRD'). Our engagement with Cheshire Wildlife Trust gives nature that voice to make sure it does not go unheard.

How we comply

Our strong approach to governance is enforced through several key policies that are communicated with all employees and other relevant stakeholders – all underpinned by our Code of Conduct.

The EET Fuels Code of Conduct supports our vision that everything we do in our day-to-day work will routinely follow high ethical standards of behaviour.

The following policies are instrumental in our governance and enforcement.

Essar health, safety & environment policy

Our business revolves around constructing and operating very large assets carrying oil and refined products. Inherently hazardous, it is critical we take all steps possible to protect our employees, contractors, guests and neighbours.

Therefore, we are committed to delivering excellence in the areas of health, safety and environment by providing and maintaining safe and healthy working conditions alongside following the best operating practices that will protect the environment. Our goal is to have no harm to people, no uncontrolled events, maintain a sustainable environment and institutionalise a strong culture of safety in the organisation.

Our HSE policy supports our Triple Goal Zero initiative and is at the centre of every business planning and decision-making process. The policy covers all activities at company owned assets within the UK, including manufacturing, distribution, retail and corporate functions. In order to further enforce and ensure that a commitment to this policy is at the heart of everything we do, we include HSE competency in the appraisal of all staff.

Whistleblower policy

EET Fuels provides opportunities for employees to raise concerns about issues that they experience, and which concern them within their role through a confidential whistleblower helpline. This service is provided by an external independent organisation which helps to provide assurance to the employee that the matter they have raised will be treated in confidence.

Additionally, we have an ongoing internal colleague awareness campaign about the existence and purpose of the whistleblower helpline.

Anti-Corruption and Anti-Bribery statement

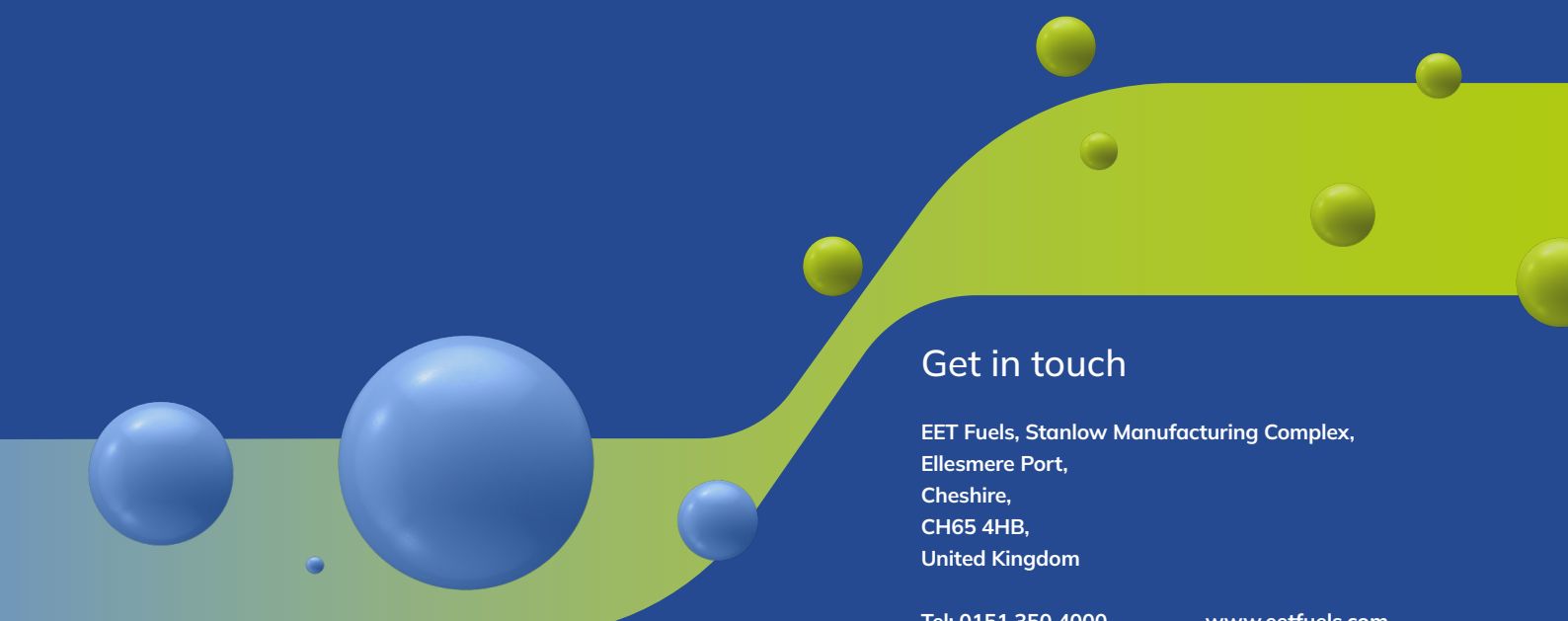
The Directors are committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on EET Fuels' behalf is responsible for maintaining the Company's reputation and for conducting business honestly and professionally. Anything less has a detrimental impact on business by undermining good governance and distorting free markets. We benefit from carrying out business in a transparent and ethical way. The Board and Executive Leadership Team are committed to implementing and enforcing effective systems to prevent and eliminate bribery, in accordance with the Bribery Act 2010.

We have an anti-bribery and corruption approach which is included in the Code of Conduct. These policies apply to all employees and all employees must complete mandatory anti-bribery and corruption policy training regularly as a prompt to ensure understanding of and compliance with our approach.

Anti-Slavery and Human Trafficking statement

EET Fuels is committed to ensuring that there is no modern slavery or human trafficking in any part of our business, and we act to require our suppliers to hold a similar ethos. We maintain clear policies and procedures to prevent exploitation and human trafficking. Awareness training has been provided to employees to help them understand the Modern Slavery Act 2015 and to provide advice to them on actions should they suspect occurrences of these activities.

Appropriate provisions have been introduced to our standard terms of business with our suppliers and an Anti-Slavery and Human Trafficking policy has been published. Our confidential whistleblower helpline allows employees to raise any concerns about these issues.



Get in touch

EET Fuels, Stanlow Manufacturing Complex,
Ellesmere Port,
Cheshire,
CH65 4HB,
United Kingdom

Tel: 0151 350 4000

www.eetfuels.com