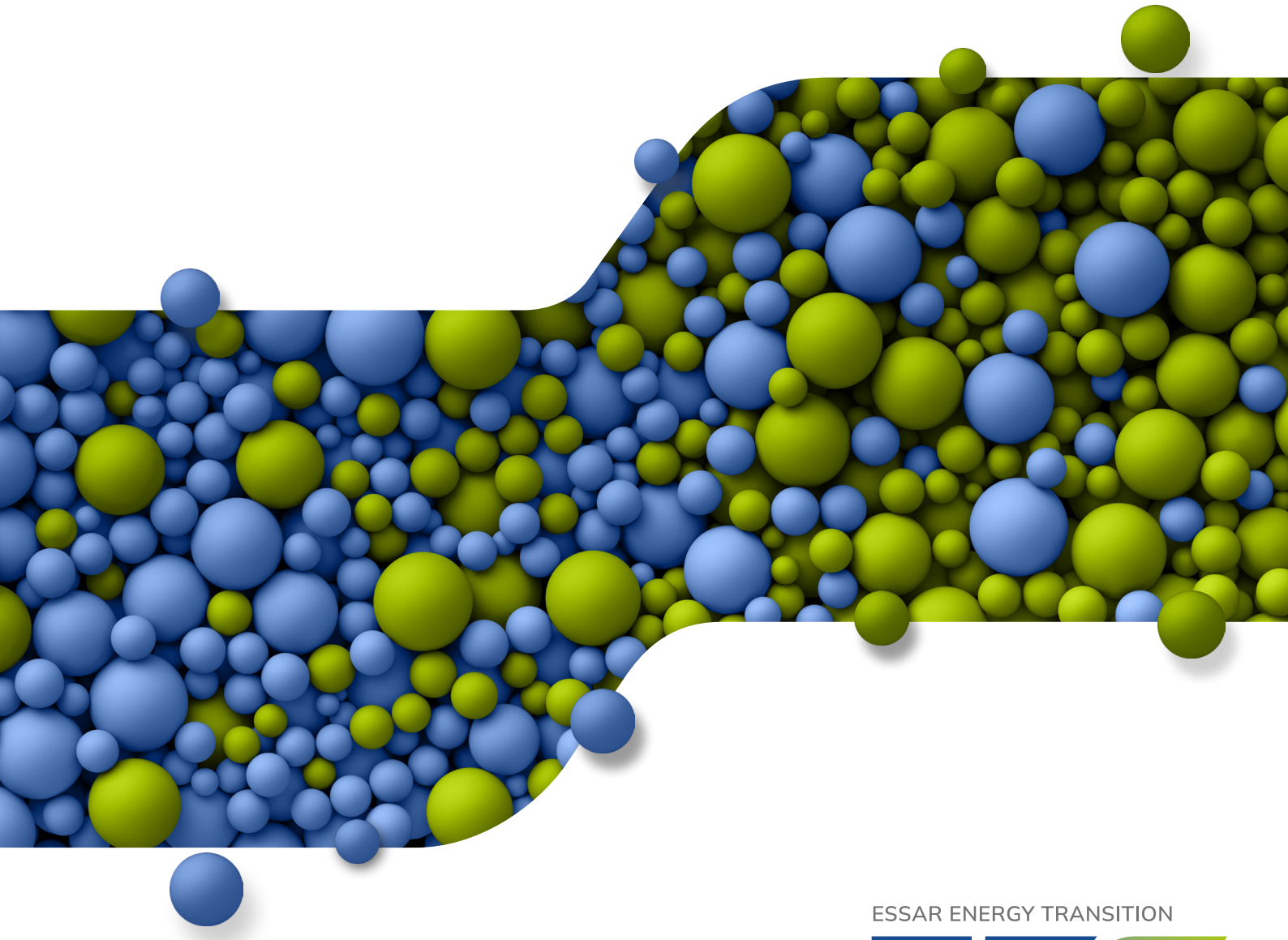
Environment, Social and Governance Report 2025



ESSAR ENERGY TRANSITION

Contents

Terms and abbreviations

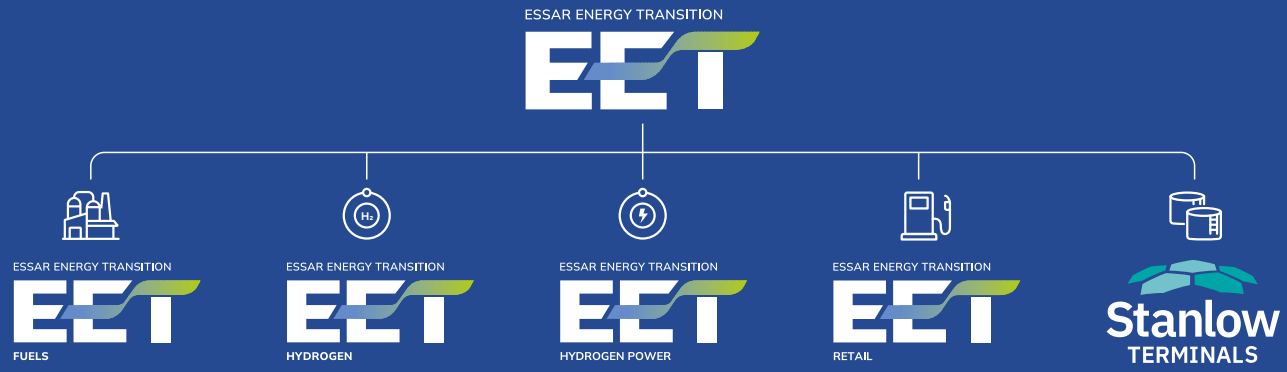
The following abbreviations have been used in this ESG Report:

Abbreviation A-E	Meaning
AQM	Air Quality Management
ARC	Audit and Risk Committee
CCRA	Climate Change Risk Assessment
CCUS	Carbon Capture, Usage and Storage
CFD	Climate-related Financial Disclosures
CHP	Combined Heat and Power
COMAH	Control of Major Accident Hazard Regulations
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide equivalent
CRO	Climate Risks and Opportunities
DBT	Department for Business and Trade
DEFRA	Department for Environment, Food and Rural Affairs
DESNZ	Department for Energy Security and Net Zero
EET	Essar Energy Transition
EET Fuels	EET Fuels (the trading name of Essar Oil (UK) Limited)
EII	Solomon Energy Intensity Index

Abbreviation F-Z	Meaning
FCC	Fluid Catalytic Cracker
FEED	Front-End Engineering Design
FRC	Financial Reporting Council
FY	Financial Year
GHG	Greenhouse Gas
HSSE	Health, Safety, Security, and Environmental
HSE-MS	Health, Safety, Environment Management Systems
MTPA	Million Tonnes Per Annum
NOX	Nitrous Oxide
RFG	Refinery Fuel Gas
SAF	Sustainable Aviation Fuels
SASB	Sustainability Advisory Standards Board
SDGs	Sustainable Development Goals
SECR	Streamlined Energy and Carbon Reporting
TCFD	Task Force on Climate Related Financial Disclosures
VOCs	Volatile Organic Compounds

About this report

This report covers the period from 1 April 2024 to 31 March 2025 (FY25) and builds on our previous ESG report. Our disclosures demonstrate our clear commitment to ESG and sustainability, as we progress towards being a leading producer of low carbon fuel and to establish a blueprint energy transition hub. As such, whilst this report reflects EET Fuels' regulatory and voluntary ESG reporting, it includes information pertaining to the whole of the Essar Energy Transition group, including Stanlow Terminals Limited, EET Hydrogen, EET Hydrogen Power and EET Retail, to provide a more comprehensive picture of our sustainability progress. In the past year, Essar Energy Transition has taken a measured and detailed approach to improving our ESG disclosures and better communicating our progress against our goals, whilst also ensuring we embody our values and integrate ESG into the ways that we make decisions and operate. These improvements are highlighted below and detailed throughout the report, outlining the progress we have made on our ESG priorities over the past year.



Climate Change Adaptation Risk Assessment

At the beginning of FY25, we engaged a third-party to conduct a detailed Climate Change Risk Assessment (CCRA) to support EET Fuels in developing an adaptation plan at our site, including both Stanlow Manufacturing Complex and Tranmere Oil Terminal. This dynamic assessment, which focused on physical climate risks that could impact our site assets over the short, medium, and long-term, resulted in key adaptation initiatives that have informed our operational resilience and site planning. Additionally, it was a key component of our Climate-related Financial Disclosures (CFD). More information on these disclosures can be found in the Climate Change Adaptation – Climate-related Financial Disclosure Reporting Snapshot section on page 14 of this report.

Strategic Plan Review

During the reporting period, we undertook a review of our strategy with a lens to how the changing ESG landscape may pose challenges but also present opportunities for EET Fuels. The review focused on two key pillars: how our Stanlow refinery can be transformed into a competitive platform for sustainable growth as part of the energy transition, and how Essar Energy Transition can explore and develop new low carbon businesses in hydrogen, renewable fuels and power, and other energy transition enabling infrastructure. The review not only supports our broader strategic objectives but is a key component of our CFD disclosures, strongly aligned to our decarbonisation journey, and informs our strategic priorities around future fuels which is detailed in the Future Fuels Development section on page 23 of this report.

ESG Materiality Assessment

To support the tracking, monitoring, and reporting of metrics that align with the priorities of our industry, the maturity of our peers, and the expectations of our stakeholders, we conducted a formal ESG materiality assessment during FY25 with the support of a third-party. The materiality assessment resulted in a set of 14 material topics and 50 associated metrics that we have reported on in this report and plan to report on in the future. We have also included commentary on a number of aligned topics. More information about our materiality assessment can be found in the ESG at Essar Energy Transition – Materiality Assessment section on page 10 of this report.

Alignment of UN Sustainable Development Goals

In our FY24 ESG report, we aligned our activities and operations to the United Nations Sustainable Development Goals (SDGs), detailing how our strategy and operations contributed to achieving prosperity for people and the planet, in line with the objectives of the UN SDGs. In FY25, we expanded the number of UN SDGs we are contributing to from seven to nine and aligned them to our metrics and reporting to enable us to demonstrate the impact of the progress that we are making. More information on our approach to aligning with the UN SDGs can be found in the ESG at Essar Energy Transition – Our ESG Alignment to the UN Sustainable Development Goals section on page 11 of this report.

Welcome from Prashant Ruia

Prashant Ruia
Executive Chair

Providing increasingly sustainable energy while beneficially impacting the communities and stakeholders around us is at the core of what Essar Energy Transition does. It is with great satisfaction that we present this Environment, Social, and Governance (ESG) report, which reflects our continued efforts and progress towards a sustainable future.

This is Essar Energy Transition's second ESG report, presenting an opportunity to review our ongoing commitment to align our strategies with global sustainability goals and demonstrate our positive impact to our stakeholders. Reliable and secure energy continues to be a foundation for national progress within the UK, and at Essar Energy Transition we remain steadfast in our mission to lead the transformation towards a low carbon future.

Essar Energy Transition's ESG efforts are centred around the United Nations Sustainable Development Goals (SDGs), and we have continued to prioritise seven goals in line with last year's report. We have also prioritised an additional two goals this year, namely Goal 3 (Ensure healthy lives and promote well-being for all at all ages) and Goal 11 (Make cities and human settlements inclusive, safe, resilient and sustainable).

Our journey has seen significant milestones this year, including investment in low carbon hydrogen technologies, conducting detailed climate change risk assessments, and the review of our wider strategy. This strategy review included developing the position of Stanlow refinery as a competitive platform for sustainable growth and the role of Essar Energy Transition in developing new low carbon businesses in hydrogen, renewable fuels, and power.

We are proud to contribute to the UK's Clean Power ambitions, not only through technological innovation but also through inclusive growth and community empowerment. This year's report reflects our belief that sustainability is a strategic imperative. We continue to align our performance indicators with the SDG Compass, ensuring transparency, accountability, and measurable progress.

Essar teams across Energy, Infrastructure, Metals and Mining, and Technology and Retail are united by a shared purpose to create enduring value while protecting the planet. As we navigate a rapidly changing global landscape, collaboration remains our greatest asset. We are grateful for the trust and support of our partners, stakeholders, and communities.

While we remain at the early stages of our journey towards transition, with the support of our stakeholders, we continue to take important steps in building a future where the provision of energy is not only secure but also equitable and resilient.

Thank you for your continued trust and support as we continue our transformative journey.

ESG approach at Essar Energy Transition

Essar Energy Transition ('we', 'our') is a leading player in the decarbonisation of the UK economy, developing and operating an energy transition hub at Stanlow Manufacturing Complex in the heart of the North West of England, near Liverpool, Chester, and Manchester.

EET Fuels' Stanlow Manufacturing Complex is home to a strategic refinery producing vital fuels for UK transportation, with almost 20% of UK road fuels supplied from here. The process of making refined products is carbon intensive, and, like most refineries, EET Fuels is an emitter of carbon dioxide (CO_2) emissions. 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 CO_2 emissions associated with their production processes, reducing our direct emissions (Scope 1) by 95% in a decade. Delivery of this ambition will mean that Stanlow is the leading low carbon process refinery.

One element of our strategy, in addition to ongoing energy efficiency and electrification, is to deliver significant decarbonisation through fuel switching to low carbon hydrogen. Essar Energy Transition is at the heart of HyNet, selected by the UK Government as one of two clusters for industrial decarbonisation. The CO_2 pipeline and hydrogen pipeline will be anchored at Stanlow Manufacturing Complex. EET Hydrogen is developing 1GW+ of low carbon hydrogen to decarbonise the Stanlow refinery as well as other local businesses, with follow-on capacity of up to 4GW to further decarbonise regional manufacturing and power generation across the whole of the North West and North Wales.

Additionally, where fuel switching or electrification is not an option, we plan to capture carbon. HyNet's Carbon Capture, Utilisation, and Storage (CCUS) network will provide the necessary infrastructure to transport and store carbon generated by our critical operations to support our decarbonisation.

As such, our business and operations, including our decarbonisation and wider ESG efforts, are underpinned by our ESG principles.

ESG performance highlights

Our ESG Performance Today, enabling Transformation for Tomorrow

Commitment to decarbonisation & climate

95% reduction in CO_2 emissions over the next decade
Our plans to deliver the leading low carbon process refinery in the next decade are expected to provide a 95% reduction in absolute CO_2 emissions compared to our 2023 baseline.

933k tCO_2e emissions reduction from biofuel blending
The average car in the UK emits 1.53 tonnes of CO_2e per year – EET Fuels' GHG reductions contributed to the equivalent of removing over 600,000 cars from the road.

Planning to enable over USD $3bn decarbonisation investment over the next decade
Our carbon reduction initiatives will require Essar Energy Transition to make significant investments to reach our decarbonisation targets.

Biodiversity and nature as a key stakeholder

Over 750m new hedgerows planted
This year EET Fuels has helped plant over 750m new species-rich hedgerows at Gowy Meadows - owned by EET Fuels and managed by Cheshire Wildlife Trust.

Over 19,000 reed and marginal aquatic plant plugs planted
Over 19,000 reed and marginal aquatic plant plug plants have been planted at Gowy Meadows, creating a crucial two-hectare reedbed habitat.

Social stewardship

26 weeks Triple Goal Zero
In the financial year ending 31 March 2025, EET Fuels has achieved 26 weeks of Triple Goal Zero (i.e., no personal safety, environmental, or process safety incidents).

Over £107k given to our communities
Our Community Giving Campaign, celebrating 100 years at Stanlow, invested over £113,000 directly into over 100 grassroots initiatives across the local community.

Gender pay gap consistency (average)
Between 2024 and 2025, our average gender pay gap remained consistent at 14.6% (14.4% in 2023).

Robust value chain collaboration & governance

Climate adaptation risk integrated as principal risk at Board-level
This year, we elevated 'Climate Risk' to a Board-level material risk, strengthening focus on managing climate-related risks and opportunities across the organisation.

£4.2 billion collected in excise duty and VAT
We play a key role in collecting and remitting excise duty, contributing significantly to UK public revenues through compliant operations.

Environmental

We maintain our commitment to the highest standards of environmental performance and continue working to eliminate our operational carbon emissions.

Social

We continue to build high quality relationships with both our people and our community, acting as a catalyst for positive change through our community programme.

Governance

The Board continues to lead our commitment to promoting our purpose within the organisation and ensuring its alignment with our strategy, objectives and culture.

These core ESG principles are reflected throughout this report and were the starting point for our first materiality assessment, our stakeholder engagement, and our alignment to the UN SDGs, as we continue performing today and transforming for tomorrow.

Materiality Assessment

To further enhance our ESG reporting and ensure we focus on what matters most to both Essar Energy Transition and our stakeholders, we conducted our first formal ESG materiality assessment with support from third-party consultants. We define a material ESG topic as an environment, social, or governance topic, such as climate adaptation, that poses financial, operational, and/or strategic risks and/or opportunities to our business.

Our materiality assessment, a process used to identify and prioritise the environment, social, and governance issues that are most significant to our business and stakeholders, has enabled us to determine which topics we should disclose in our sustainability reporting, as well as which ESG issues and topics should inform strategic decision-making. We plan to review and refresh the findings on an annual basis as our organisation continues to evolve.

The materiality assessment focused on refining a longlist of over 20 ESG topics. This list was informed by peer benchmarking, desktop research, and relevant industry-specific standards (e.g., Sustainability Advisory Standards Board (SASB)).

The identified ESG topics were scored for their impact to stakeholders and their impact to Essar Energy Transition. This was informed through review from key business leaders and based on our deep understanding of stakeholder priorities, underpinned by strong relationships. This ensured that relevant stakeholder perspectives and expectations were considered when identifying material topics. We therefore identified a list of 13 highly material topics (six environment, four social, and three governance). Whilst our ESG reporting prioritises the 13 highly material topics for reporting, we have also chosen to report on a select number of additional topics that are integral to providing a well-rounded and transparent view of our ESG performance.

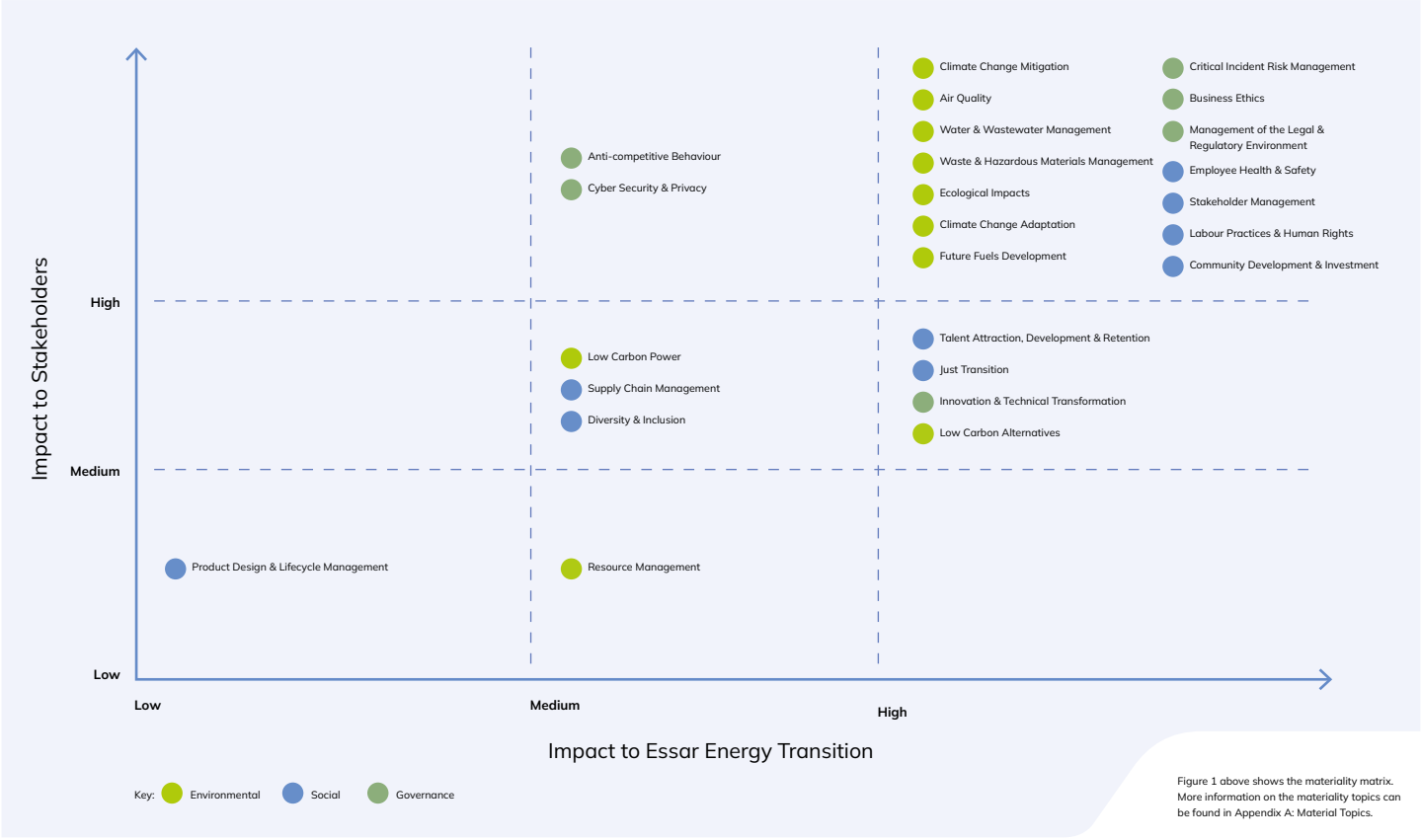


Figure 1 above shows the materiality matrix. More information on the materiality topics can be found in Appendix A: Material Topics.

We then developed a list of ESG metrics, aligned to the identified material topics, based on a number of sources including leading ESG frameworks and standards (i.e., SASB and the European Sustainability Reporting Standards) and metrics that EET Fuels already collects and reports on. These are often required in line with our designation as an upper-tier Control of Major Accident Hazard (COMAH) site.

Metrics have been reported within the corresponding environment, social, and governance sections of this report, with the full list and associated descriptions available in Appendix B: Material Metric Tables.

Our ESG alignment to UN Sustainable Development Goals

Last year we chose to align our strategic and operational activities to the UN Sustainable Development Goals (SDGs), a practice we continue to uphold this year.

The UN SDGs are a set of 17 interconnected objectives calling for urgent collective action from governments, businesses, and communities worldwide. They seek to address pressing global challenges such as inequality, climate change, health and education issues, whilst simultaneously promoting economic growth.

Essar Energy Transition plays an important role in global sustainability, as one of the leading players in the UK's energy industry with a pivotal role in the country's decarbonisation journey. Therefore, we recognise our responsibility to align our business operations and strategic goals with achieving environmental and social well-being to promote fair development, ultimately creating a more equitable and sustainable world.

This year we have identified two additional SDGs where our operations and strategic priorities can further contribute towards meeting the world's urgent environment, social, and economic challenges. These are Goal 3 (Good Health and Well-being) and Goal 11 (Sustainable Cities and Communities).

These, alongside those identified in last year's report, are presented below at goal level. Whilst each SDG has been aligned with the most relevant pillar of ESG, it is important to note that the UN SDGs do not occur in isolation and instead encompass all aspects of sustainability.

Environment

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

Goal 11: Make cities and human settlements inclusive, safe, resilient and sustainable.

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 3: Ensure healthy lives and promote well-being for all at all ages.

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.

Environmental performance

Overview

Essar Energy Transition is committed to the highest standards of environmental performance and plans to achieve significant reduction in EET Fuels' direct (Scope 1) CO_2 emissions compared to our 2023 baseline. The Environmental Performance 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 as well as annually to the Environment Agency (EA). This supports compliance with the permits which have been granted to EET Fuels under the requirements of the Environmental Permitting Regulations.

This section is organised around the environmental topics identified as highly material by our materiality assessment. More information on the materiality topics can be found in Appendix A: Material Topics.

Material Topics:

- Climate Change Adaptation
- Climate Change Mitigation
- Air Quality
- Water & Wastewater Management
- Waste & Hazardous Materials Management
- Ecological Impacts
- Future Fuels Development

In addition, we have reported on the following topics that are important to Essar Energy Transition's environmental performance, but were not identified as material through our materiality assessment.

Material Topics:

- Just Transition – Energy Security

UN SDGs and our environmental impacts

Essar Energy Transition has identified the following UN SDGs that relate to our environmental impacts and have, where possible, associated each SDG with the relevant material topics from our materiality assessment. The tables in Appendix B: Metrics Tables show the alignment of reported metrics against the relevant SDGs.

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

Key SDG target(s): 7.2 Increase global percentage of renewable energy.

Increasing the global percentage of renewable energy is an essential part of diversifying the UK's energy mix and facilitating energy security. Essar Energy Transition continues to contribute to increasing global renewable energy through investments into hydrogen and biofuels. Our key role in HyNet will enable us to support fuel resilience throughout the UK and our decarbonisation efforts will support lower carbon processes for fuel products to support energy transition.

Relevant Topic: Future Fuels Development.

Goal 11: Make cities and human settlements inclusive, safe, resilient and sustainable

Key SDG target(s): 11.6 Reduce the environmental impact of cities, paying special attention to air quality and municipal and other waste management.

Our responsibility extends beyond cities, applying equally to the reduction of environmental impacts on the local towns and communities immediately surrounding our operations. This includes the wider communities of Elton, Thornton-le-Moors, Ince, Helsby, Frodsham, Ellesmere Port, and beyond. As an upper-tier COMAH site, we continue to make significant improvements to air quality and waste management, ensuring the safety of our surrounding communities and contributing to more sustainable and liveable local environments.

Relevant Topic: Air Quality.

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

Key SDG target(s): 13.3 Build knowledge and capacity to meet climate change.

Our approach to combating climate change is delivered by our colleagues. We promote continuous learning and growth within Essar Energy Transition, from understanding the basics of climate change to developing technical skills through our partners such as the HyNet Academy. We prioritise fostering the climate leaders of tomorrow throughout all levels of education in our communities including direct school outreach and valuable work experience and apprenticeships.

Relevant Topic: Climate Change Adaptation and Climate Change Mitigation.

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

Key SDG target(s): 15.5 Protect biodiversity and natural habitats.

Given the proximity of our Stanlow refinery to a site of biological importance, our work at Gowy Meadows is essential in contributing to the protection of biodiversity. We support the protection of over 160 hectares of land, home to over 150 species of birds, and an abundance of insect and plant species.

Relevant Topic: Ecological Impacts, Water & Wastewater Management and Waste & Hazardous Materials Management.

Climate Change Adaptation

Essar Energy Transition recognises that increasing physical risks, such as extreme weather events, temperature volatility, and water scarcity, pose material risks to operations, supply chains, and infrastructure. Proactively integrating climate resilience into our planning and operational activities ensures long-term operational resilience.

Climate-related Financial Disclosure Reporting Snapshot

Responding to and managing our climate-related risks and opportunities (CROs) is an explicit element of our strategy and business model and is inherent to achieving our decarbonisation goals.

The full disclosure of our second mandatory climate-related financial disclosures under the Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2021 (UK CFD Regulations) can be found in our annual report. The disclosures were informed by a detailed CCRA conducted by a third-party, including both Stanlow refinery and Tranmere Oil Terminal, to understand the physical climate risks that could impact our site assets over the short, medium, and long-term. Our CFD disclosures are summarised below, structured around the four Task Force for Climate Related Financial Disclosures (TCFD) pillars of Governance, Strategy, Risk Management, and Metrics and Targets.

Governance

Our Board provides strategic oversight and governance of EET Fuels' CROs and is supported by our Audit and Risk Committee (ARC) and Health, Safety, Security, and Environmental (HSSE) Committee. The Board is responsible for reviewing our strategy in line with identified CROs and setting our future direction to address the climate-related needs and expectations of our stakeholders.

This year, 'Climate Risk' was introduced as a new material risk, formally elevating it to the Board-level and placing additional focus on the management of CROs throughout the organisation.

Risk management

EET Fuels has integrated the assessment of CROs into our risk management process, treating CROs in the same way as traditional risks that have the potential to severely affect our business. Our CRO management approach is collaborative between EET Fuels and third-party consultants to identify and assess CROs and develop adaptation and management plans.

We update our CROs annually and conduct comprehensive assessments to identify new risks and opportunities with support from third parties. To continue improving the management of our CROs, we have created a climate risk taxonomy and configured our risk management system to capture CROs, including risk descriptions and assessments, inherent and residual risk rationales, key controls, and risk owners.

Strategy

EET Fuels assesses CROs over three time periods, aligned with our prior year assessment and strategic planning. This has also been guided by available data within UK Climate Projections (UKCP18), a set of climate projections developed by the Met Office to help the UK prepare for future climate change and provide detail on how the UK's climate may change under different GHG emission scenarios. Our three time periods are as follows:

- Short-term = 2025 – 2030
- Medium-term = 2031 – 2050
- Long-term = 2051 – 2100

CROs from both physical risks (i.e., the impacts of both acute and chronic shifts in weather) and transition risks (i.e., the impacts that arise from the shift to a low carbon economy), as well as associated opportunities, were examined. We report on CROs that we define as 'material' to EET Fuels, meaning they could materially impact our business model, our operations, and/or our strategic direction now or in the future if they were not managed.

As a result, the following CROs were identified:

Climate-related Risks	
Physical Risks	**Transition Risks**
Heavy rainfall and surface water flooding (and standing water)	Inability to decarbonise fast enough
Hotter days (and nights)	Reduction in refined product demand
Coastal erosion	Immaturity of the hydrogen market
Climate Related Opportunities	
Fuel switching as a driver of decarbonisation	
Opportunities for uptake of low carbon alternatives	
Access to UK Government support for energy transition activity	

Metrics and Targets

We disclose our GHG emissions and energy consumption in accordance with the Streamlined Energy and Carbon Reporting (SECR) framework. These details can be found in our annual report. Where possible, material CROs have been aligned with internal metrics and ambitions to allow for ongoing monitoring, underpinning future metrics and targets which will be reported in subsequent reports.

Climate Change Mitigation

We recognise the sector's heightened exposure to climate-related risks, such as physical impacts from extreme weather events. As such, we view climate change mitigation not just as a responsibility, but as an opportunity to innovate, improve efficiency, and develop lower carbon products that create long-term value. Our ambitious decarbonisation plans are a strategic driver that underpins our current and future business model.

Our Decarbonisation Journey

Essar Energy Transition is committed to playing a key role in the decarbonisation of the UK's economy, with our goal to become the UK's first low carbon process refinery and drastically reducing our direct (Scope 1) carbon emissions by 95% in a decade compared to a 2023 base year. Whilst 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 low carbon and reliable fuel sources for years to come.

EET Fuels' approach centres on investing in and transforming its Stanlow refinery through a combination of fuel switching, industrial carbon capture and energy efficiency measures, all supported by unrivalled infrastructure and expertise. Over the last four years, approximately £130m on the purchase and installation of the hydrogen-ready furnace and another £60m on the development of Hydrogen Production Plant 1, Hydrogen Production Plant 2 and Industrial Carbon Capture projects, with an estimated $3 billion over the coming years.

The Solomon Energy Intensity Index (EII) score is a global benchmark metric used predominantly in the refining and petrochemical sectors to assess energy efficiency and is a key performance indicator. This index compares our actual energy consumption to an industry-standard baseline for comparable facilities (i.e., in size and complexity) where an EII score of 100 equates to industry-average performance and scores below 100 signal better-than-average efficiency. Investments made in the reporting period are expected to deliver a significant improvement in our EII. This is primarily due to three areas of investment:

1

In March 2025, EET Fuels completed the installation of two cutting-edge Texas Towers, also known as vertical combined feed exchangers, at Stanlow, which have improved energy efficiency by using the heat from hot process fluids to preheat incoming cold streams.

By replacing outdated equipment, they reduce the load on fired heaters – industrial furnaces that burn fuel to heat process fluids – thereby lowering our fuel use and operating costs.

Additionally, they are designed to withstand extreme conditions, ensuring reliable performance in harsh weather environments.

2

In April 2025, just outside of the reporting period for this report, EET Fuels successfully completed the installation and connection of a new hydrogen-ready CD4 furnace to the refinery system.

Now fully operational, providing average energy savings of 4,413 MWh / month, the furnace is capable of running on either 100% refinery fuel gas (RFG), a blend of RFG and hydrogen fuel, or 100% hydrogen. The furnace will be conventionally fuelled until it can transition to 100% CCUS-enabled hydrogen produced by EET Hydrogen.

Air quality improvements have also been noted, with nitrous oxide (NOx) emissions, one of DEFRA's five key air pollutants, at 45% less than the previous furnace. The furnace will allow us to do more with less, reducing the energy required per tonne of production.

3

We have made substantial investments to modernise and upgrade our facilities to address operational inefficiencies, such as steam leaks and condensate losses.

As a result, the plant is now operating with improved efficiency and enhanced stability.

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 CO_2e savings 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 our planned hydrogen-ready combined heat and power plant (CHP). The remaining 0.9 MTPA of emissions can be reduced through industrial carbon capture (ICC).

Fuel Switching

Fuel switching enables the replacement of high carbon fuels with lower-emission alternatives, such as hydrogen or low carbon power. This reduces direct emissions across industrial processes and transport, supporting net zero targets. Fuel switching will also be prioritised via retrofitting, with plans to retrofit EET Fuels' process fired heaters to replace hydrocarbons with hydrogen from EET Hydrogen.
Hydrogen fuel switching forms a significant component of our decarbonisation strategy, feeding into several decarbonisation projects across our sites. We have made significant progress in hydrogen fuel switching via the successful installation and connection of our new hydrogen-ready CD4 furnace to the Stanlow refinery in early 2025.

Equally important is Essar Energy Transition's capacity to both export power to the grid and import it when needed. This bi-directional flexibility enables us to adapt to changing grid dynamics whilst contributing to a more resilient and sustainable energy system.
Whilst investment in hydrogen infrastructure directly benefits Essar Energy Transition's operations, its impact extends beyond the refinery. By integrating these systems with the broader energy network, Essar Energy Transition is laying the groundwork for regional decarbonisation. Though not a new concept, it is becoming increasingly vital, using existing and future infrastructure not only to meet internal sustainability goals but also to catalyse regional industrial decarbonisation and economic growth.

Hydrogen Ready, Multi-Fuel Combined Heat and Power Plant

Essar Energy Transition is developing Europe's first hydrogen-fuelled CHP plant which will replace our existing CHP and rebalance our future steam and power needs. This will see power generated from high efficiency hydrogen gas turbines instead of traditional, inefficient steam turbines, enabling us to all but eliminate our need for grid-based electricity and eliminate our Scope 2 emissions. This is currently at the Front-End Engineering Design (FEED) stage, with consenting applications to be submitted in FY 2025/26.

Industrial Carbon Capture

Carbon capture plays a significant role in our decarbonisation strategy, allowing us to capture the carbon that we cannot reduce through fuel switching.

In March 2024, EET Fuels applied to support the development of an industrial carbon capture facility to the UK government as part of the Carbon Capture, Usage and Storage Cluster Sequencing Process Track-1 expansion (T1x) of the HyNet CCUS cluster process. Plans for industrial carbon capture (ICC) have an estimated 47% contribution to the site's emissions reduction. The ICC facility is designed to capture carbon from our Fluid Catalytic Cracker (FCC). EET Fuels has one of the largest full residue FCCs in Europe. It will be imperative to capture the carbon from the FCC unit and store it, which will be achieved leveraging the HyNet transport and storage infrastructure being developed by Liverpool Bay CCS (part of the ENI group).

The positive environmental impacts of this project will include a 35 MW reduction in energy use, alongside significant reductions in particulate matter and major pollutants, namely SOx and NOx, to single digit parts per million levels, thereby reducing emissions as well as improving air quality. Carbon capture could eliminate half of Stanlow refinery's emissions. The FEED stage is currently in progress for our carbon capture project, which has incorporated the findings from our pre-FEED design study completed in 2023.

Although it falls outside of the reporting period, it is worth noting that ENI and the UK Government achieved financial close on the core CO_2 transport and storage project underpinning the HyNet Cluster in April 2025. This milestone enables construction of critical infrastructure to reduce emissions and support jobs in North West England and North Wales.

In August 2025, the Department for Energy Security and Net Zero (DESNZ) announced the conclusion of applications into the T1x programme. Six projects will be taken forward through the negotiation phase, including Essar Energy Transition's ICC and HPP2 projects, to receive support to join the HyNet cluster. HPP2 is the second phase of EET Hydrogen's hydrogen hub with a capacity of 1,000 MW, bringing the overall target capacity, including HPP1, to 1,350 MW.

Projects to be taken forward have been classified as "priority", representing the current preferred configuration for the cluster, or "standby", providing contingency against priority projects. Essar Energy Transition's ICC and HPP2 projects have both been classified as 'standby' and the status of projects will be kept under review, with 'standby projects' expected to benefit when capacity becomes available.

This announcement falls outside the relevant reporting period (1 April 2024 – 31 March 2025) and its implications will be addressed in future reports as outcomes continue to develop.

Our Greenhouse Gas Emissions

As part of our ambition to decarbonise, EET Fuels develops and discloses an annual greenhouse gas (GHG) inventory, comprised of our Scope 1 and Scope 2 emissions. The energy and carbon figure relating to Scope 3 Grey Fleet is estimated to make up less than 1% of the total energy and carbon totals for the Group's energy consumption and resultant GHG emissions. In line with the GHG Protocol Corporate Standard, they are not included in this report.

This reporting meets the requirements of the Streamlined Energy and Carbon Reporting (SECR) regulations for EET Fuels operations in the UK. Details of the SECR disclosures, including a full list of our energy efficiency actions, can be found in our Annual Report.

From the period of 1 April 2024 to 31 March 2025, our total combined Scope 1 and 2 gross GHG emissions were 1.84 million tonnes on a CO_2 equivalent basis (tCO_2e), a decrease of 10.87% compared to the previous period (1 April 2023 – 31 March 2024) and a decrease of 5.17% compared to the period from 1 April 2022 to 31 March 2023, which is the base year for our emissions reductions efforts. This was an in-year effect resulting from a turnaround event at site.

Our Scope 1 emissions have decreased by 11.01% since the previous year. We expect our Scope 1 emissions to decrease in the coming years through energy efficiency and switching the feed fuels for most of our high-emitting equipment to hydrogen from 2029 onwards. In addition, we plan to build the carbon capture facility to reduce emissions from our catalytic cracker as soon as we have confirmation from the UK government.

Our Scope 2 emissions decreased by 7.65% compared to last year. Again, we expect Scope 2 reductions will occur when our 100% hydrogen CHP comes online. Consenting applications are planned to be submitted in FY26.

Our plans to address Scope 3 emissions are in the main driven by our biofuels business, which ensures that we are compliant with mandates for blending of biofuels into jet fuel, diesel and gasoline. In addition, we are preparing for the advent of the non-HEFA mandate within the UK SAF mandate, by investing during the reporting period in studies for the development of a Methanol-to-Jet plant at Stanlow (which recently since the end of the reporting period has been supported by an Advanced Fuels Fund grant from the Department of Transport) - more detail on page 23.

Stanlow Manufacturing Complex will benefit from access to CO_2 and H_2 pipelines as a result of recent or pending government decisions, which will enable the development of an energy transition hub for the decarbonisation of North West England and provide an ideal location for investment. We continue to work with our value chain to understand where the biggest impacts and efforts can be achieved.

Air Quality

EET Fuels is keenly aware of the importance of maintaining high air quality standards and adequate controls as the potential release of harmful pollutants, such as Volatile Organic Compounds (VOCs), including carcinogens like benzene, as well as hydrogen sulphide, could pose serious health risks to both our workers and the communities we operate in.

With regulatory and stakeholder scrutiny increasing, managing air emissions is therefore not only a matter of compliance but essential to protecting health, ensuring safe operations, and maintaining our social licence to operate.

Working with the relevant local authority (Cheshire West and Chester), the Environment Agency (EA) and our fence line communities, EET Fuels has delivered significant improvements to local air quality. Since the implementation of an air quality management plan (AQM), introduced in 2016 with monitoring stations situated in local villages, air quality incidents have been all but eliminated.

This is a result of significant process improvements made to reduce sulphur emissions, including investments in decarbonisation technologies. Indications from the local authority suggest that work undertaken to address issues identified in the AQM plan has delivered the required improvements. We are actively working with the local authority and a third-party organisation to validate the modelling and confirm that the air quality improvements achieved are accurate, allowing us to proceed with closing the AQM.

In September 2024, an unplanned shutdown at our Stanlow refinery led to the release of non-toxic dust to the surrounding area. Whilst the dust release did not pose any health and safety risks, we appreciate the distress that this type of incident can cause to affected communities. We therefore recognise, despite this being an isolated incident, the need for clear and timely communication with the local community, including ensuring information is readily available. EET Fuels is therefore working with the EA to develop standardised information to provide to the public should another isolated incident occur.

Water & Wastewater 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 EA. Reducing our freshwater use and increasing the circularity of the water we withdraw is a key component of our sustainable and responsible operations and an ethos we've implemented across our organisation, embedding it into the planning and design of future projects.

The refinery's processes use water from several sources, continuing to recycle water where possible across the refinery processes to minimise freshwater usage. Between 2019 and 2024, our investment in effluent improvements have halted our abstraction of water from the Manchester Ship Canal, eliminating 51,000 m^3 of freshwater withdrawal per day.

To reduce the amount of contaminated effluent discharged into controlled waters, such as the River Gowy, EET Fuels commissioned a multi-million pound project in 2022 to route the site's significant wastewater streams to the United Utilities Ellesmere Port Wastewater Treatment works. This has shown a significant reduction in the average oil discharged to controlled waters from 101,460 kg per annum between 2019 and 2022 to 26,610 kg per annum between 2023 and 2024, reducing harmful substances such as phenols, cyanide, and benzene to levels that meet regulatory limits. All process improvements aimed at environmental performance have been completed, and efforts are ongoing to further improve standards for measuring discharges with completion expected in the summer of 2026.

Waste & Hazardous Materials Management

As an upper-tier COMAH site, the responsible management of waste and hazardous materials is essential for the protection of our employees, local communities, and the environment we operate in. Inadequate controls can lead to dangerous spills, fires, or environmental contamination, triggering regulatory breaches and operational disruptions.

We have operating practices in place to minimise waste and 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 seek to maximise opportunities for recycling and reuse of materials.

This approach to waste management is regulated by the EA.

Ecological Impacts

Ecological impacts are a material concern given our proximity to Gowy Meadows, a site of biological importance, and our reliance on natural ecosystems for clean water in the refinery process. Refining and hydrogen production activities - if not carefully controlled - can damage habitats, reduce biodiversity, and affect ecosystem resilience. With emerging ESG regulations placing greater emphasis on nature and biodiversity, strong ecological management is essential for regulatory compliance and ecological responsibility.

Gowy Meadows, a 160-hectare site owned by EET Fuels and managed by Cheshire Wildlife Trust, continues to thrive as a hub for biodiversity in the region. Despite its industrial surroundings, the reserve supports a mosaic of habitats including floodplain marsh, grassland, meadows, ditches, ponds, and wildlife-rich hedgerows. These diverse ecosystems provide refuge for a wide range of species and contribute to regional conservation goals.

The site is home to over 150 bird species, including visiting Marsh Harriers, and supports nationally rare wildlife such as the Water Vole. Otters have also been observed, alongside a variety of dragonflies, butterflies, damselflies, and other rare plant and animal species.

Gowy Meadows plays a key role in supporting rare freshwater invertebrates and wading birds.

In 2024, several major habitat enhancement projects were completed:

- New ponds were added in spring, significantly improving water clarity and increasing the diversity of aquatic and marginal plant species.
- Over 750 metres of native hedgerows were planted, including berry-producing species vital for overwintering birds such as Redwing and Fieldfare. It is hoped that the hedgerow will also provide a buffer for the impacts of sound and vibration from the M56 motorway.
- Freshwater habitats were expanded through the creation of multiple linear foot drains and three scrapes, providing seasonal wetland areas that support resilient populations of freshwater species.
- A two-hectare reedbed was established at the heart of the reserve, planted with over 19,000 reed and marginal aquatic plug plants to enhance habitat for birds and aquatic life.
- Visitor access was improved, making the site more accessible year-round and supporting community engagement through activities led by Cheshire Wildlife Trust staff and volunteers.

Work continues with Cheshire West and Chester Council, local charities, and external consultants to develop a comprehensive biodiversity net gain strategy. This approach aims to enhance local biodiversity whilst supporting future planning applications and sustainable development.

Future Fuels Development

The development of future fuels, driven by both regulation and market demand, will play a vital role in decarbonising hard-to-abate sectors. Investing in future fuels is not only a climate imperative and a regulatory requirement under schemes such as the Renewable Transport Fuel Obligation (RTFO) and the UK Sustainable Aviation Fuel (SAF) Mandate, but a strategic opportunity for Essar Energy Transition to drive industrial renewal, energy diversification, and long-term resilience.

Investing in biofuels production and storage represents a significant opportunity for Essar Energy Transition. We are developing the UK's largest biofuels storage hub, allowing customers to store, blend, and distribute biofuels suitable as a drop-in replacement fuel for road, aviation, and marine transport.

Currently, EET Fuels supplies a large volume of biofuels to the UK market. Of the 6,411 million litres of road fuels we supplied in 2024, 455 million litres were renewable or classified as biofuels. According to the Department for Transport's Renewable Fuel Statistics 2023: Final Report, renewable fuels, such as biofuels, offer GHG savings of up to 82% when compared to fossil fuels. This results in an estimated emissions reduction of approximately 933,165 tonnes of CO_2e through biofuel blending, equivalent to removing around 610,100 average UK cars from the road (based on each emitting about 1.53 tonnes of CO_2e annually). To progress our ambitions for future fuels development, Essar Energy Transition is primed to lead the national charge in the development of changing energy infrastructure and creating one of the UK's largest and most comprehensive sustainable energy hubs.

Our future fuels business will be established around five core pillars, which are provided in detail below, and utilise our established import terminal infrastructure owned and operated through Stanlow Terminals Limited. These developments are subject to appropriate engagement with relevant stakeholders including our regulators and our local community.

1. Sustainable Aviation Fuel (SAF) Hub

From 1 January 2025 the UK's SAF mandate requires a minimum share of 2% of aviation fuel used in the UK to be derived from sustainable aviation fuels. This will increase gradually over time to 10% by 2030 and generate an expected demand of up to 7.5 million tonnes per annum (MTPA) in the EU and UK.

The development of our SAF offering is central to Essar Energy Transition's future fuels strategy. We plan to establish Stanlow Terminals Limited as the regional SAF import, storage and blending hub, supported by our plans to establish our own Methanol-to-Jet (MtJ) production hub at Stanlow. The MtJ production hub will use around 550,000 tpa of renewable e-methanol and bio-methanol to produce approximately 200,000 tpa of advanced SAF. The proposed MtJ facility is targeted to start up in the early 2030s and will enable EET Fuels to meet its own advanced SAF obligations under the UK SAF Mandate as the requirements start to ramp up in the mid 2030s.

Advanced SAF produced at the hub will utilise our established UK jet export infrastructure, including the Manchester Jet, Midlands, and UKOP oil pipeline systems, as well as existing road and marine distribution routes, allowing supply to regions across the UK. This infrastructure already supplies ten UK airports. Stanlow's unique location allows for future scaling of SAF production as demand grows, with strong integration opportunities with broader low carbon initiatives across the business.

In July 2025, Essar Energy Transition was awarded £2.5 million from the UK Government's Department for Transport (DfT), as part of its Advanced Fuels Fund (AFF) scheme, to continue the development of our plans to become one of the UK's largest advanced SAF production hubs. Following a Feasibility Study in early 2025, the AFF grant allows us to progress to the Pre-Front-End Engineering Design (pre-FEED) stage, with completion of pre-FEED by March 2026 and Final Investment Decision (FID) by 2027.

2. Renewable Methanol Import and Distribution

Stanlow Terminals Limited is developing options to increase current renewable methanol import, storage, and handling capabilities to enable significant volumes of renewable methanol to be imported from inside and outside the UK, supporting Stanlow Terminals Limited to be the regional renewable importer and distributor. Compared to conventional fuels, renewable methanol cuts carbon dioxide emissions by up to 95% and reduces nitrogen oxide emissions by up to 80%.

These options include the expansion of existing methanol import and storage infrastructure to enable up to 1 MTPA of renewable methanol to be handled at Stanlow and Tranmere and direct supply links from Essar Future Energy's own large-scale e-methanol project being developed in Gujarat, India. These developments will enable Stanlow Terminals Limited to import the necessary renewable methanol for the MtJ facility for SAF production and will directly support renewable methanol marine vessel bunkering which is a key part of establishing the Liverpool-Belfast green shipping corridor.

3. CO_2 Import Terminal

Stanlow Terminals Limited is in the early stages of exploring the potential to develop one of the UK's first and largest open-access CO_2 vessel import terminals at both our Tranmere and Stanlow sites. These will be capable of receiving, gathering, and storing up to 7 MTPA of CO_2 from stranded industrial emitters in the UK and EU through vessel, rail and road Non-Pipeline Transfer (NPT) for onward transfer to permanent CO_2 sequestration transport and storage (T&S) systems.

These plans include new-build CO_2 storage vessels and associated facilities to be installed to receive liquefied CO_2 from liquid CO_2 (LCO_2) vessels and transition this to the required state/specification to export into the CO_2 network(s), including the infrastructure being developed through the HyNet CCUS cluster and by Spirit Energy in Morecombe Bay. Stanlow Terminals Limited's location offers direct access to regional offshore CO_2 storage with combined storage of >25mpta and is ideally located to support Wales, Northern Ireland, the West Coast and the South Coast of the UK as well as wider EU imports.

4. Low Carbon Hydrogen Transport, Storage, and Distribution Hub

As part of Essar Energy Transition's future fuels strategy, we plan to develop a new comprehensive standalone large-scale future fuels road terminal, providing road-based imports and exports for emerging low carbon products. In the longer term this will support CO_2 and green ammonia road-handling capacity. The road transport sector will be hard to decarbonise, as heavy vehicles require long ranges to transport heavy loads over high utilisation periods. It is expected that hydrogen will be the fuel of choice through the adoption and proliferation of fuel cell electric vehicles (FCEV) which will require a network of hydrogen refuelling hubs.

Leveraging the relationship between Stanlow Terminals Limited and EET Hydrogen, the proposed hydrogen road transport distribution hub will enable the widespread adoption of hydrogen vehicles and the decarbonisation of hard-to-abate parts of the road transport sector.

Additionally, the road terminal is planned to be further integrated with the aforementioned CO_2 import terminals and our proposed green ammonia terminal to further progress our future fuels ambitions.

5. Green Ammonia

Green ammonia is set to take a large role in the decarbonisation of the maritime industry through its use as a zero carbon marine fuel. Green ammonia also can be used within the fertiliser market, as a derivative for other green chemical production as well as a fuel in boilers, turbines or engines to generate heat and electricity, reducing greenhouse gas emissions.

To position Stanlow Terminals Limited as the regional green ammonia importer and distributor, we are exploring opportunities to develop and an access import terminal capable of handling up to 2 MTPA of green ammonia for onwards distribution within the UK and use within the marine industry.

The development includes direct supply links from Essar Energy Transition's own large-scale green ammonia project being developed in Gujarat, India, with future options to develop a new ammonia cracking facility to convert green ammonia back to green hydrogen for onward distribution via the regional hydrogen pipeline network.

Similar to our renewable methanol import and distribution plans, the development of green ammonia terminal infrastructure would also enable Stanlow Terminals to directly support green ammonia marine vessel bunkering to further establish the Liverpool-Belfast green shipping corridor.

Just Transition – Energy Security

As the energy system undergoes rapid decarbonisation, maintaining energy security remains a critical priority. A just transition recognises the need to balance environmental progress with the continued delivery of reliable, affordable, and resilient energy. This means managing the phased retirement of carbon-intensive assets alongside the scale-up of low carbon alternatives without compromising system stability. By integrating considerations of energy security into our transition strategy, we aim to facilitate an orderly and inclusive transition that builds long-term stakeholder confidence in energy reliability.

UK Industrial Strategy

In June 2025, the UK Government released the UK's Modern Industrial Strategy - a 10-year, government-led framework designed to drive long-term business investment and develop globally competitive, future-facing industries. It concentrates investment and policy support on eight high-potential sectors, including clean energy, using tools such as the National Wealth Fund and public procurement to draw in private capital, modernise infrastructure, and create skilled jobs. Representing a strategic shift from short-term fixes to sustainable growth, the strategy creates a predictable, innovation-friendly environment across regions whilst nurturing sectors poised to lead economic transformation.

As part of the strategy, a Clean Energy Industries Sector Plan has been released, setting out a roadmap with which to accelerate the clean energy transition and put the UK at the global forefront by 2035. The plan proposes reforms to the business environment and will double down on frontier clean energy industries with the greatest growth potential, including both hydrogen and CCUS. It sets ambitious investment targets alongside substantial public funding commitments, stimulating skills development, the creation of jobs, and long-term economic growth. Hydrogen and CCUS form two of the five core pillars around which Essar Energy Transition's future fuels hub will be established, further supporting our ambitious decarbonisation plans.

Our Role in the Nation's Energy Security

UK policy requires significant growth in clean power generation by 2030. This has created a favourable regulatory environment supporting the production and transport of low carbon power. Hydrogen is part of this transition. It enhances the UK's energy security by diversifying the energy mix, providing a flexible home-grown energy source to reduce reliance on imported fossil fuels, and lessens exposure to global price volatility.

Hydrogen-fuelled power plants are emerging as an option to produce low carbon back-up power and could represent up to 5% of overall

demand. Its ability to be stored at scale and deployed across different industries also helps balance supply during periods of low renewable generation, strengthening resilience and ensuring a more stable, secure energy system.

The UK Government remains committed to delivering 10 GW of low carbon hydrogen production capacity by 2030, with a growing focus on green hydrogen. The development of business models which support hydrogen production with hydrogen pegged at the price of natural gas has been positive, though there is a need for more work on the transport, demand and storage models.

EET Hydrogen is a key player in this transition, actively contributing to the Government's near-term target of 1 GW by mid-2025, with a portfolio exceeding 1 GW of projects including the country's leading large-scale, low carbon hydrogen plant. Strong demand for hydrogen is expected to continue in the HyNet cluster, especially for industrial decarbonisation, power and steel applications. Essar Energy Transition is uniquely positioned to support the energy transition through strategic use of the HyNet hydrogen infrastructure that will be established through the UK's CCUS cluster programme.

In October 2024, Essar Energy Transition welcomed UK Government support for the HyNet cluster, representing a critical moment in the UK's hydrogen industry. When the grid is saturated with low carbon power – such as during periods of high renewable generation – EET Hydrogen plans to be able to import this low carbon energy to generate heat and produce hydrogen, storing it for future use. This approach not only enhances energy efficiency but also supports grid stability by absorbing surplus low carbon electricity when it is most abundant.

EET Hydrogen has secured agreements to supply over 30 businesses across industrial, power, and transport with locally produced low carbon hydrogen, with ten new Memoranda of Understandings (MoUs) signed. The signed MoUs reflect a total demand of ~29 TWh/year, equivalent to a hydrogen production capacity of ~3.3GW, demonstrating the substantial growth and decarbonisation opportunity from hydrogen within HyNet and beyond. HPP2 can be co-located with HPP1 at the Stanlow Manufacturing Complex with a proposed production capacity of up to 1000 MW, enough energy to power a city like Liverpool, capturing up to 1.8 million tonnes of CO_2 per year (the equivalent of taking around 700,000 cars off the road). HPP2 is currently in the Government's Track 1 Expansion process for HyNet as a 'standby' project.

Social stewardship

Overview

Essar Energy Transition holds itself to a high standard regarding our social values. We are committed to safety and focused on the needs of our communities, customers and people. 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 is organised around the social topics identified as highly material by our materiality assessment. More information on the materiality topics can be found in Appendix A: Material Topics.

Material Topics:

- Employee Health and Safety
- Stakeholder Management
- Community Development and Investment

In addition, we have reported on the following topics that are important to Essar Energy Transition's social stewardship, but were not identified as material through our materiality assessment.

Material Topics:

- Development of Women
- Just Transition – Social Impacts

26

UN SDGs and Our Societal Stewardship

Essar Energy Transition has identified the following UN SDGs that relate to our environmental impacts and have, where possible, associated each SDG with the relevant material topics from our materiality assessment. The tables in Appendix B: Metrics Tables show the alignment of reported metrics against the relevant SDGs.

Goal 3: Ensure healthy lives and promote well-being for all at all ages

Key SDG target(s): 3.9 Substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination.

Pollution from hazardous contaminants in air, water, and soil remains a leading environmental risk, contributing to millions of premature deaths each year. Rapid industrialisation, urbanisation, and poor waste management have intensified exposure, particularly in vulnerable communities. Oil and gas refining is a significant source, releasing particulate matter, VOCs and heavy metals that can endanger nearby populations and ecosystems.

Essar Energy Transition is investing in lower carbon technologies, stricter emissions controls, and responsible waste management to reduce health impacts from refining, supporting better health, compliance, and sustainable energy production.

Relevant Topic: Employee Health & Safety and Stakeholder Management.

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

Key SDG target(s): 5.5 Ensure full participation in leadership and decision making.

Gender equality is a human right and a driver of economic growth and social development. Empowering women and girls strengthens families, improves health, and fosters national growth, with companies playing a key role in promoting workplace equity and leadership representation.

Essar Energy Transition operates 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 and around 32% in the renewable energy workforce[1]. As such, we recognise our responsibility to make a difference.

Relevant Topic: Development of Women.

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

Key SDG target(s): 4.4 Increase the number of people with relevant skills for financial success.

As per Article 26 of the Universal Declaration of Human Rights, education is a fundamental human right. Businesses are uniquely positioned to support learning and development throughout an individual's educational and professional journey. Not only is a highly educated workforce essential for achieving climate goals, but it is also a key factor in the success of individuals no matter their vocation.

Essar Energy Transition supports development and education through engagement with students from primary school through to graduation, especially in underserved communities near our facility. This priority for continued learning is practiced. at Essar Energy Transition with our work experience, apprenticeship, and continued learning programmes to ensure education progresses even after individuals leave school.

Relevant Topic: Community Development and Investment and Just Transition – Social Impacts.

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

Employee Health and Safety

The oil and gas industry presents inherent occupational health and safety risks that are being increasingly intensified by climate change via rising heat stress and more frequent extreme weather events.

As an upper-tier COMAH site handling large volumes of hazardous substances, we recognise the importance of maintaining robust health and safety measures. The health, safety and well-being 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 the review of standard operating procedures to take steps to mitigate risks, safeguarding not only our workforce, but also the surrounding community.

As such, EET Fuels has adopted a culture of continuous improvement. Regular safety standstills are conducted to share best practices and ensure that learnings from incidents are embedded into our management system and organisational culture. From this, we ensure that changes are made to our policies, procedures, and organisational behaviours accordingly.

Well-Being

Well-being is a key priority across all parts of society, and we understand the important role that well-being plays in work and home life. Well-being covers a broad range of topics, including financial well-being, mental or physical health, and personal relationships.

EET Fuels has an occupational health centre for the well-being of employees. Its experienced team proactively manages programmes designed to support the health and well-being of employees. This includes monthly well-being 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. This year we also saw over 100 EET employees participating in company organised sporting events.

Health, Safety and Environment (HSE) Policy

Our business revolves around constructing and operating very large assets carrying oil and refined products. Potentially hazardous by nature, 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 HSE by providing and maintaining safe and healthy working conditions alongside following the best operating practices that will protect our people, our community and our environment. Our priorities are 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. As such, we engage with business partners and suppliers to manage HSE in line with our HSE Policy. It is reiterated that safety continues to be everyone's responsibility, with accountability being a collective responsibility of every Essar Energy Transition and business partner employee.

The HSE policy is communicated to employees and to relevant business partners and is supported by training which is provided on a regular basis. Additionally, 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. Regular reviews are carried out to ensure compliance with the HSE policy.

Health, Safety and Environment Management System

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.

EET Fuels' HSE-MS 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 directors ultimately monitor the effectiveness of the various HSE policies and systems through the HSSE 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 EA on a quarterly and annual basis where performance relates to permits issued under the Environmental Permitting Regulations.

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

The Control of Major Accident Hazard Regulations

The COMAH Regulations provide the regulatory oversight of the process for major accident hazards to both people and the environment at EET sites. This is a form of management system and enables us to demonstrate that it can safely and adequately control major accident hazards.

To support compliance with all aspects of these regulations, EET has implemented a management system which covers these comprehensive requirements. The Health and Safety Executive is the lead regulatory authority for COMAH, while EET Fuels provides regular reports to them regarding our performance. Known as the “competent authority”, along with the EA, the regulator has an intervention programme in place which is used to test operational compliance with requirements. The interventions also test that EET Fuels has adopted recommended good practice.

Oversight of our approach to safety is provided by the Health, Safety, Security and Environment Committee of the Board. This committee has set several leading and lagging key performance indicators (KPIs) for the business, such as Triple Goal Zero performance, personal safety, process safety, regulatory issues and asset integrity. 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. EET Fuels has put plans in place to deliver performance improvements, this year delivering 26 Triple Goal Zero weeks. This is a significant improvement on the previous two years (13 weeks in 2023 and 20 weeks in 2024).

We also continue to participate in combined industry and regulatory working groups to develop best practice and currently chair a number of Fuels Industry UK committees, including the process safety leadership network. This is part of a commitment to improve process safety performance across the whole sector. Our involvement in the one working group has contributed to the development of standardised regulatory approaches suitable for refineries across the UK under the relevant national regulators. We also participate in information sharing and exploring how new standards are applied across the industry.

Stakeholder Management

Our value chain forms a central component of our ESG journey. We place a great level of importance on effective stakeholder relationships throughout the value chain at local, national, and international levels. Many of our stakeholders have a material interest and influence on the delivery of our long-term strategy, business plan and business objectives and therefore are key inputs into the EET Fuels' purpose of Performing Today - Transforming for Tomorrow.

Below, we detail the stakeholder groups that are critical to Essar Energy Transition and how we engage with these groups to ensure we understand their expectations for Essar Energy Transition, not only with regards to ESG performance, but also our overall strategy and operations.

Employees

Our employees are central to our continued operations, with their feedback, expectations, and opinions underpinning safety and sustainability at Essar Energy Transition. Employees regularly receive engaging information regarding our activities, plans and performance, overseen by the Executive Leadership Team.

Colleagues can attend a variety of events that provide business updates and which support development, networking, education, and community building. In 2024 we re-introduced our Town Hall events, occurring every six months, which, along with our “huddles”, see around a third of Essar Energy Transition employees in attendance. Events are also livestreamed for those unable to attend in person. These events provide employees with the opportunity to engage with leadership, ask questions, and stay aligned with company goals. Our huddles provide a more informal environment where employees can discuss specific issues as they arise.

In 2024, we introduced our weekly ‘News to know, this week’ colleague newsletter to keep staff informed on updates and events taking place across Essar Energy Transition. This complements the long-established weekly refinery updates and regular business updates provided by the Chief Operating Officer and Chief Executive Officer respectively. We also continue the use of digital noticeboards across the site, providing an effective and engaging way to keep colleagues up-to-date and share strategic developments.

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. Colleagues not included in the collective agreement are represented through our Employee Forum. The agreement commits EET Fuels to the establishment of regular forums, attended by the Executive Leadership Team and senior Unite the Union stewards. 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.

Pensions

EET Fuels 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 EET Fuels, including employed deferred members of the defined contribution scheme and those who commenced employment on or after this date.

- Defined Contribution Scheme: EET Fuels' defined contribution scheme is operated by Aviva for the benefit of all employees who commenced work with EET Fuels 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: Disclosures with regard to the position of the Essar Oil (UK) Pension Scheme and performance of the scheme (in accordance with IAS 19: 2011 revised). This scheme was closed for any future accrual as at 1 January 2022.

Community

We recognise the impact our operations can have on the local community who have supported us for over 100 years. As such, we are committed to continuing our role as a responsible corporate neighbour. In addition, EET Retail, our UK retail business, is transforming with a fresh, new purpose: 'Driving Community Convenience' – focusing on serving the convenience needs of local communities in which our sites are a hub.

We continue to prioritise collaborative engagement, cultivating an environment in which members of the local community can express their concerns and maintain open communication. Community Liaison Panel meetings are held bi-annually, providing the opportunity to hear from the parish councils of fence-line communities, local councillors, the local authority, regional teams from our regulators, and members of parliament. These events provide invaluable insight to Essar Energy Transition about the concerns of local communities and ensures opportunities are developed in a collaborative way. Following the major fallout incident that occurred this year, we have also made improvements to the process for communicating externally when an incident occurs, as discussed in the Air Quality section of this report on page 19.

This year, as part of our Centenary celebration, Essar Energy Transition launched the Stanlow Refinery 100 Grants Campaign to give back to the community that has supported us for a century. We take pride in the positive impacts and engagement we have with our local community, a responsibility and a privilege that we strive to improve upon year after year. More information on this can be found in the Community Development and Investment section of this report overleaf.

Business Relationships (Customers and Suppliers)

A key objective to deliver on our strategy is to foster our existing business relationships to support their own growth and priorities while attracting new relationships. This has been supported through regular interaction with our customers and suppliers through our dedicated teams.

Our customer base primarily includes supermarkets, major oil companies, commercial bulk users, resellers, aviation companies and independent retailers. Revenues from the single largest customer contributes to approximately 20% of EET Fuels' overall revenues. To improve our relationships, we continuously review and enhance our product offering and make multi-year commitments with key customers. The business is also investing in technological improvements to improve the customer business experience. During the year, we have expanded our supply points to enhance our customers' experience.

In FY25, EET Retail announed the opening of two new service stations, with more expected to be opened in the coming years in line with its ambitious strategy to develop a significant portfolio of Essar-branded fuel retail outlets.

We 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 manage risk throughout our supply chain and increase operational efficiencies.

Financial Stakeholders

Communication and engagement with shareholders are predominantly delivered via regular meetings with the Board. All key matters, including strategic, operational and financial issues, are discussed in line with a pre-agreed agenda. In addition, regular communications, including financial updates and investment plans, are provided to ensure transparency, inputs and ongoing engagement.

Essar Energy Transition is actively engaging with key financial stakeholders to anticipate and understand the sustainability information required for alignment with recognised frameworks, such as the Equator Principles. Whilst primary responsibility to adhere to the Equator Principles rests with our financers, we must maintain practical compliance, ensuring the provision of required documentation demonstrating a clear understanding of the associated environmental and social standards.

Regulators

The oil and gas sectors are subject to significant health, safety and environmental regulation. We continuously monitor regulatory developments to ensure compliance and maintain well-established mechanisms for engaging with its regulators to gain insight and to contribute positively.

Members of the EET Fuels' Executive Leadership Team hold regular update meetings with regulatory bodies the Health and Safety Executive, the Environment Agency and with representatives of relevant local authority leadership teams.

Working with our regulatory stakeholders, EET Fuels is committed to sustainable refinery processes and conducts its operations within relevant environmental standards.

Government (Local and National)

Developing effective relationships with national and local policy makers, built on a shared understanding of each other's ambitions and objectives, is essential to the effective strategic development and day-to-day operation of our business. The importance of having an effective relationship in place has been particularly relevant as we manage risk associated with political change.

Members of the Executive Leadership Team hold regular update meetings with the Department for Energy Security and Net Zero, the Department for Transport and with the Department for Business and Trade, as well as sitting on the UK Government's Ministerial CCUS Council. This continues to be supplemented by engagement with HM Treasury and the Prime Minister's policy teams. Additionally, as part of an Indian multinational group, our approach includes engagement with Indian government representatives, interested in outward investment. Recent engagement has focused on the role we play in delivering the ambitions of the UK Government's Clean Energy Superpower goal, seeking to position the UK as a global leader in the production, export, and deployment of low carbon energy technologies. Essar Energy Transition maintains close working relationships with the Members of Parliament who represent constituencies containing our operations and with representatives of our local authority. Through close collaboration and regular engagement, day-to-day issues are resolved efficiently while supporting strategic discussions.

Following significant political events in the UK, India, and the US throughout 2024, Essar Energy Transition has worked to mitigate any associated potential risk by developing a wide range of relationships with representatives from across the political spectrum at both a local and national level. This has resulted in a shared understanding of policy priorities and the belief that there is adequate assurance to continue with investment plans.

Industry Groups

Essar Energy Transition actively engages with a number of trade associations and industry groups, such as Fuels Industry UK, Chemical Industries Association, Carbon Capture and Storage Association (CCSA), Hydrogen UK, the Renewable Transport Fuels Association and the Federation of Petroleum Suppliers (FPS). We also currently chair and participate in a number of Fuels Industry UK (FIUK) committees and have representation on the boards of FIUK and CCSA. This engagement fosters a mutually beneficial relationship, enabling us to help shape industry standards, sector performance, regulatory approaches, and participate in information sharing, whilst ensuring our operations align with best practice.

Nature

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

Giving nature a 'voice' aligns with 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 a voice to make sure it does not go unheard.

More information on our engagement with nature and the Gowy Meadows can be found in the Ecological Impacts section on page 22 of this report.

Community Development & Investment

We recognise the significant impact our operations can have on the surrounding area and are committed to supporting community development and resilience through targeted investment, collaboration, and long-term engagement. We seek to align our community development and investment activities with local needs across four themes: education, environment, well-being, and community.

Education

Our educational programme supports children from a range of backgrounds and stages in their academic life. It focuses on providing engagement and education from primary school age through to our apprenticeship and work experience programmes, supporting the learning and development of our communities and ensuring financial success through placements at Essar Energy Transition. In FY25, we engaged with over 1,600 students through various events and engagement channels.

Essar Energy Transition continues to support the Fred Venables Higher Education Trust which provides students most in need with grants in the critical period as they transition from school and home to further and higher education. This focused support is for students from challenging backgrounds. This year, nine students received grants from the Trust, each averaging £1,000. 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.

Essar Energy Transition also continues to support the Passion for Learning Careers Day, the Amazed by Science Festival and the STEAM Festival. The Careers Day gave more than 300 Key Stage 2 (KS2) students the chance to explore different careers. Meanwhile, the STEAM Festival welcomed over 700 students KS2 pupils to experience opportunities in science, technology, engineering, arts and mathematics.

We also delivered hour-long in-class workshops across 11 local schools, totalling 300 children aged nine to 11, exploring the future of green energy, aligned with the national curriculum and our own sustainability goals.

Essar Energy Transition also provides our employees with opportunities and special leave to spend time in local schools to give back to the community, developing the sustainability leaders of tomorrow. Additionally, our recruitment team visited several local universities and high schools this year, such as University of Liverpool, Chester College, University of Lancashire, and South Wirral High School, to conduct mock interviews with students.

Environment

Protecting the natural environment is more important than ever. Essar Energy Transition supports the Cheshire Wildlife Trust by providing a base for them at the EET Fuels-owned Holly Bank House and Gowy Meadows woodland area. The Cheshire Wildlife Trust continues to support Gowy Meadows and, working together, it provides a popular local recreation site and a place where visitors can learn more about the natural environment. More information can be found in the Ecological Impacts section on page 22 of this report.

Essar Energy Transition also supported Green Expo UK and sponsored visits by Mad Science. Green Expo UK engages with around 300 students from Key Stage 2 to Key Stage 4 and provides opportunities for hands-on learning about hydrogen, biofuels and carbon capture. Mad Science participated in classroom experiences for around 300 KS2 children from 11 Ellesmere Port primary schools to help them learn about current and future fuels.

Community

Representatives of Essar Energy Transition support the Ellesmere Port Development Board which brings businesses, local authorities, public sector representatives, and charities together to support the development of the town. In 2024, the Board collaborated with Cheshire West and Chester council in launching the Origin brand, which we continue to support in celebrating and demonstrating the investment opportunity associated with the Ellesmere Port Industrial Zone.

Essar Energy Transition continues to provide support to Entep Properties. Established to provide a space for start-up businesses in our local community, Entep Properties now hosts a range of small, successful businesses and is considering development plans for the coming years.

Proud shirt sponsor of Tranmere Rovers Football Club, this partnership also reaches into the local community where Essar Energy Transition regularly collaborates with the club's registered charity, Tranmere Rovers in the Community, to deliver its community outreach programme and initiatives. Last Christmas, Essar Energy Transition continued its support of the Super White Christmas appeal, ensuring that disadvantaged people have access to a Christmas meal and celebrations. This included food hamper deliveries, Christmas parties (for both children and adults), a Christmas dinner for care leavers and matchday experiences.

Essar Energy Transition continues to support the Chester Half Marathon and Four Villages Half Marathon. This year saw around 6,000 runners participating in the events, including 40 EET employees. The event also includes a Family Fun Run which encourages children to engage with sport. The half marathon follows the EET-supported Four Villages Half Marathon which sees 1,500 runners each year pass close by our site as they complete the 13-mile course.

In July 2025, Essar Energy Transition completed the acquisition of Thornton Science Park, a 66-acre space featuring modern purpose-built laboratories, office space, and industrial facilities. As part of our plans to create one of Europe's leading energy transition hubs, the park will host the next generation of innovators, engineers, and scientists. Thornton Science Park will continue its role as a significant energy transition, innovations, and skills hub for the region as it becomes the UK headquarters for our Essar Energy Transition businesses. This will include EET Fuels, EET Hydrogen, Stanlow Terminals Limited, EET Hydrogen Power, and EET Retail.

In celebration of our 100th anniversary, Essar Energy Transition launched the Stanlow Refinery 100 Grants Campaign to give back to the community that has supported us for a century. Through this campaign, over £100,000 was invested to support more than 100 grassroots initiatives, including youth clubs, environmental clean-up campaigns, and educational workshops.

The Stanlow Refinery 100 Grants Fund was open to applications from registered charities and not-for-profit organisations operating in education and skills development, environment and sustainability, community health and well-being, and culture and heritage. By prioritising these four areas, Essar Energy Transition is not just investing in projects but also in people, in potential, and in a shared vision of a brighter future. Grants ranged from £500 to £1,000, and applications were evaluated based on their potential to make a positive impact on the local community.

By supporting local initiatives, we aimed to foster a stronger, more resilient community whilst celebrating our rich history and looking forward to the next 100 years of innovation and growth.

Case Study

Stanlow Refinery 100 Grants Campaign: West Kirby Grammar School's Wildlife Habitat Project

West Kirby Grammar School utilised a grant to transform a previously unused area of the school grounds into a thriving wildlife habitat.

The project was designed to support local biodiversity whilst providing students with practical experience in environmental conservation, enriching their educational journey and instilling a sense of environmental stewardship.

The habitat is used as an outdoor classroom for subjects such as biology, geography, and art. Lessons are designed to incorporate real-world environmental issues and conservation techniques.

Students participate collaboratively in the maintenance and monitoring of the habitat, gaining practical skills in gardening, biology, and environmental science. Students can also conduct experiments and observations, contributing to ongoing research projects and learning about scientific methods and data analysis.

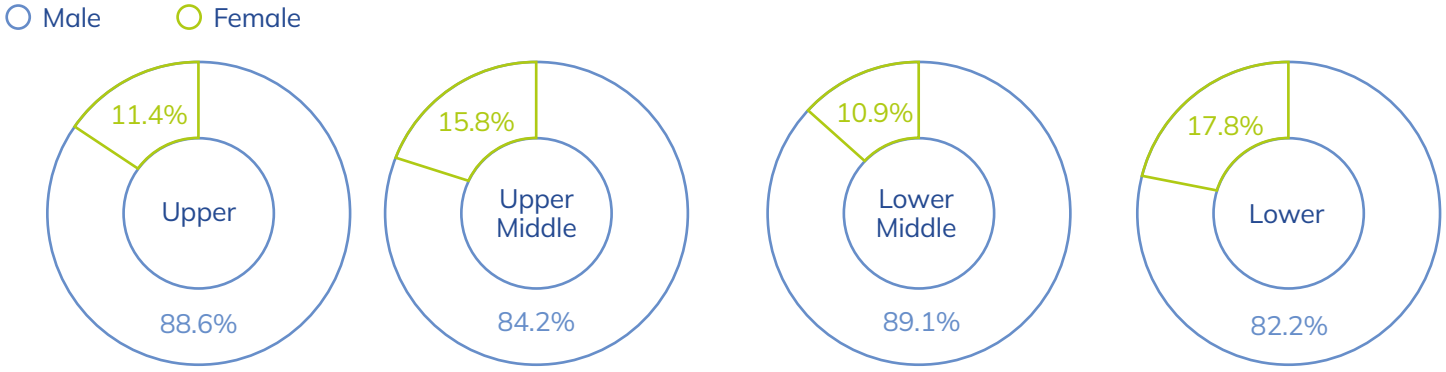
The space now includes a variety of native plants, a pond, bird feeders, and insect hotels. The project emphasises sustainable practices, such as composting, rainwater harvesting, and the use of native plants that require minimal maintenance. The school also collaborates with local environmental organisations and invites community members to participate in habitat maintenance and educational events.

Development of Women

Operating in a historically male-dominated industry, EET Fuels recognises its responsibility to support the inclusion and empowerment of women in the workforce. Doing so is essential to building a more diverse and future-ready organisation. Advancing gender equality strengthens our ability to attract, retain, and develop talent in an increasingly competitive labour market. By actively investing in the development of women across all levels of the business, we help close industry gaps, foster innovation, and ensure our workforce reflects the communities in which we operate.

Whilst we are proud of our work so far, we continue to leverage our positive recruitment ethos to offer more jobs to more women. The makeup of women across our workforce has increased year-on-year, from 14% in FY24 to 15% in FY25. We continue to develop flexible working practices and have improved gender representation in the Essar Energy Transition Executive and Senior Leadership Teams through key appointments and promotions. We also provide support for women in the workplace through a women's network group and leadership programme, identifying elements of our recruitment processes which may limit the progression of women, whilst taking action to address any hurdles.

We continue to make progress to close the gender pay gap and this is reflected in our most recent Gender Pay Gap report. The mean and median gender pay gap have remained stable from 2023 to 2024 from 14.4% to 14.6% for the mean, whilst the median has improved from 5.0% to 2.4%. The proportion of men receiving a bonus remained stable at 88.0% whilst the proportion of women receiving likewise fell slightly from 88.0% to 81.4%.



Just Transition – Social Development

Recruitment and Development

EET Fuels has a monthly average number of 894 employees (including Directors) represented by two groups, salaried and trade union employees.

Essar Energy Transition recruits individuals who are enthusiastic and focused on operational excellence and serving our customers, as well as having the potential to progress via internal career opportunities.

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

Employee development is monitored by way of continual assessment and appraisal. We have introduced a competency-based employee performance management system, a specialised software that assesses, tracks, and manages employee skills, knowledge, and abilities. The system will help streamline talent management whilst ensuring compliance with an upper-tier COMAH site's requirement to demonstrate, maintain, and evidence the competence of all personnel in safety-critical roles.

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.

Access to a skilled labour force is essential for the successful delivery of maintenance events and energy transition infrastructure projects. This needs to be supported by the development of staff and movement of skilled people. Opportunities arise from both the need for short-term skilled contractors to support investment events like a turnaround, and from the mobility of workers to provide technical expertise over the longer-term, to support programmes like the Essar Energy Transition plan.

Training and Development

Essar Energy Transition 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.

As an upper-tier COMAH site, competence is essential and highly valued. This is reflected in the Health and Safety and technical training employees are required to undertake. Important skills and knowledge gained ensure employees consistently demonstrate competence in their roles. EET Fuels' HSE competencies have been developed to ensure Essar Energy Transition is safe and meeting regulatory requirements.

Colleagues completed 519 training days and 4,112 online training sessions in the reporting period. Training ranges from essential and professional competency through to leadership development and mentoring. Dale Carnegie Leadership training for all leaders was completed within the reporting period. 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 culture in which Essar Energy Transition has no confirmed cases of mistreatment, sexual harassment, or discrimination against employees of the organisation.

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 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.

Future skills planning and preparation is of critical importance to us and for the future of Essar Energy Transition, as well as the energy transition. We are actively developing new training resources through our e-Learning platform to support Essar Energy Transition employees in understanding the value and implications of the energy transition and our decarbonisation journey. Additionally, we are working with the HyNet Training Board to identify and develop training for the future of the energy sector.

Apprenticeship Programme

Essar Energy Transition understands and values the benefits and opportunities that apprenticeship and graduate programmes bring and continues to offer a comprehensive programme. From April 2024 to March 2025, 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.

Over thirty graduates joined EET Fuels in 2024/25, covering disciplines including legal, engineering, technology and finance, taking the total number of graduates in training to 63 from FY23 through to FY25. During the same period 55 apprentices also joined, with roles covering engineering and manufacturing, IT, commercial, legal, and business administration, making the total number of apprentices 112.

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

EET Fuels plans to recruit ten graduates and 18 apprentices in the 2025/26 period.

Robust governance

Overview

Essar Energy Transition's approach to governance is rooted in acting with integrity and high ethical standards at all levels of our organisation. EET Fuels has 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 our values of honesty, integrity, and professionalism.

This section is organised around the governance topics identified as highly material by our materiality assessment.

Material Topics:

- Labour Practices and Human Rights
- Management of the Legal and Regulatory Environment
- Critical Incident Risk Management
- Business Ethics

In addition, we have reported on the following topics that are important to ensure robust governance practices at Essar Energy Transition, but were not identified as material through our materiality assessment.

Material Topics:

- Tax Transparency

UN SDGs and our approach to governance

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

Key SDG target(s): 8.2 Diversify, innovate and upgrade for economic productivity.

The UK energy sector employs a large, skilled workforce operating in high-risk environments where labour rights, safety, and fair conditions are critical. Investing in robust governance practices and improving operational processes helps to create more productive, sustainable employment whilst driving broader economic growth.

Essar Energy Transition is committed to maintaining high-quality labour standards across our operations, supported by formal statements, frameworks, and policies.

These measures ensure accountability, provide structured processes for addressing issues, and enable continuous improvement over time.

Relevant Topic: Labour Practices and Human Rights.

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

Key SDG target(s): 9.4 Upgrade all industries and infrastructures for sustainability.

Ageing, deteriorated, or inadequate infrastructure, combined with inflexible and non-adaptable processes, can create significant business challenges, especially regarding the energy transition as regulatory and legal environments change.

Essar Energy Transition's decarbonisation efforts support the UK regulatory changes to position the UK as an energy leader as well as contribute to the UK's net zero 2050 goals. It is imperative that we invest in innovative technologies and infrastructure that will position us as leaders in the energy industry, enabling us to support and encourage sustainable innovation across the industry, while complying with and proactively addressing.

Relevant Topic: Management of the Legal and Regulatory Environment.

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

Key SDG target(s): 8.8 Protect labour rights and promote safe working environments.

A safe working environment is central to the protection of people, the environment, and our assets over the long-term, especially in an industry where regulatory standards and safety expectations are continuously evolving.

As an upper-tier COMAH site operating in an industry highly exposed to hazards, health, process safety, and personal safety are all embedded within our organisational culture and policies, forming two of the three focal areas of our Triple Goal Zero initiative (personal safety and process safety).

Relevant Topic: Critical Incident Risk Management and Business Ethics.

Labour Practices and Human Rights

The Wates Corporate Governance Principles

The Wates Principles are published by the Financial Reporting Council (FRC) and can be found here. 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:

EET Fuels continues to embed all elements of the Wates Corporate Governance Principles for Large Private Companies ('Wates Principles') into our structures and processes, with plans to further enhance this in the coming years to strengthen alignment with our annual report.

1

Purpose & leadership
An effective board develops and promotes the purpose of a company, and ensures that its values, strategy and culture align with that purpose.

2

Board composition
Effective board composition requires an effective chair and a balance of skills, backgrounds, experience and knowledge, with individual directors having sufficient capacity to make a valuable contribution. The size of a board should be guided by the scale and complexity of the company.

3

Director responsibilities
The board and individual directors should have a clear understanding of their accountability and responsibilities. The board's policies and procedures should support effective decision-making and independent challenge.

4

Opportunity & risk
A board should promote the long-term sustainable success of the company by identifying opportunities to create and preserve value and establishing oversight for the identification and mitigation of risks.

5

Remuneration
A board should promote executive remuneration structures aligned to the long-term sustainable success of a company, considering pay and conditions elsewhere in the company.

6

Stakeholder relationships & engagement
Directors should foster effective stakeholder relationships aligned to the company's purpose. The board is responsible for overseeing meaningful engagement with stakeholders, including the workforce, and having regard to their views when taking decisions.

Anti-Slavery and Human Trafficking Statement

Essar Energy Transition is committed to ensuring that there is no modern slavery or human trafficking in any part of our business, and we act to ensure our suppliers take a similar stance. 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 on actions should employees suspect occurrences of activities defined within the act.

Appropriate provisions have been introduced to our standard terms of business with our suppliers. We also publish an Anti-Slavery and Human Trafficking statement, which is reviewed and updated annually. The confidential whistleblower helpline provided by Essar Energy Transition for employees allows them to raise any concerns about these issues.

Whistleblowing

Essar Energy Transition provides opportunities for employees to raise concerns about issues that they experience and which involve 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.

Management of the Legal and Regulatory Environment

As a producer of 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, the UK Emissions Trading Scheme, and the UK Sustainable Aviation Fuel mandate. Additionally, our status as an upper-tier COMAH facility requires a robust level of reporting, management, and oversight to ensure we achieve the highest standards possible and maintain our ability to operate.

Whilst these changes pose risks to our business, we continue to welcome them as opportunities to address industrial decarbonisation whilst continuing to supply the fuels and chemicals required by the market today. Essar Energy Transition is deploying mitigation and adaptation measures, supported by innovative infrastructure, such as Europe's first hydrogen-ready CHP plant (more information can be found in the Climate Change Mitigation section on page 16 of this report).

Our efforts to manage the legal and regulatory environment allow us to respond proactively and invest in the infrastructure, skills, and adaptations necessary to continue to be a supplier of choice for energy and chemical products amidst regulatory and legal changes.

Critical Incident Risk Management

As an upper-tier COMAH site operating in an energy-intensive and high-hazard industry, the management of critical incidents is fundamental to protecting people, the environment, and our assets. Climate change has the capacity to increase the likelihood and intensity of disruptive events, such as extreme weather and heatwaves. As such, strengthening our preparedness and response capabilities is becoming increasingly important to ensure we can respond quickly and effectively to evolving risks as they occur.

Under COMAH, we are required to conduct comprehensive hazard assessments, implement robust risk-reduction measures, and establish emergency plans to prevent major accidents involving hazardous substances at our sites. As part of this, we have set out the following measures, focusing on both prevention through education and preparedness to respond effectively should incidents occur.

Emergency Response and Security (ERS)

We have emergency plans in place at our Stanlow and Tranmere sites to minimise the effects of any incident, supported by our own full-time on-site emergency response service. Our specialist teams work in shifts to ensure that there is 24/7/365 coverage and are equipped with an extensive fleet of sophisticated vehicles and range of equipment. We have a team of 32 full-time staff on hand to provide immediate response to potential emergencies, with additional security support from a dedicated team of ten personnel. The team provides key advice, expertise, specialised equipment, and an expert fire service to ensure the safe and secure operation of the Stanlow Manufacturing Complex. They also provide medical cover, assessing patients where necessary by shift medics and treating them accordingly.

Experience and Training

The team members, many of whom have formerly been employed by the British Forces and County Fire Brigades, are highly experienced with qualifications from relevant organisations, including Fire Risk Assessors and the Institute of Fire Engineers (IFE). This is further complemented by constant training, enabling a rapid response to any potential situation. They also provide comprehensive training to on-site personnel on subjects such as breathing apparatus, defibrillator, and confined space awareness to promote a clear and consistent attitude towards fire and security across the site.

Anyone adhering to our Triple Goal Zero initiative is required to observe The Life Saving Rules at all times, reinforcing what employees and contractors must know and do to prevent serious injury or significant incident. For example, wearing seatbelts and obtaining authorisation before entering a confined space.

Local Community

Our emergency response team is on hand to help with incidents in our neighbouring communities. Through their 'Adopt a Watch' scheme with the local County Fire Brigade, they have built strong relationships with local emergency services and external agencies. The scheme offers support during emergency situations that often occur off-site, or within the surrounding local community. Incidents such as road traffic collisions,

the vast majority of which are on external perimeter roads, are handed over to the county police, fire, or ambulance service as soon as they arrive. The firefighting team is always available for emergencies as and when required.

Health, Safety, and Environment Policy

Given the inherently hazardous nature of the industry we operate in, it is critical for us to be proactive in protecting our employees, contractors, guests, and neighbours. Further information on our Health, Safety, and Environment (HSE) Policy can be found in the Employee Health and Safety section on page 28 of this report.

The implementation of the Essar Group HSE policy is the collective responsibility of every employee and business partner. Our commitment to adhere to site rules, standards, processes and procedures prevents both personal and process safety incidents and injuries. This requirement is supported by the arrangements documented in the EET Fuels' BMS and the Trade HSE standards ETS700. Arrangements for applying this policy to major accident hazards are documented in the Process Safety Policy. We constantly monitor our HSE performance, setting and reviewing improvement targets, and embedding HSE competency as a core element in all staff appraisals.

Business ethics

Maintaining the highest standards of ethical behaviour is essential to maintaining trust with our employees, local communities, and broader stakeholders. Evolving societal expectations place increased scrutiny on how we conduct our operations responsibly and transparently across all organisational levels.

Our strong approach to governance is enforced through several key policies, referenced throughout this report, that are communicated with employees and relevant stakeholders and 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.

Anti-corruption and anti-bribery statement

The Directors are committed to applying the highest standards of ethical conduct and integrity in our business activities. Every employee and individual acting on our behalf is responsible for maintaining our reputation and for conducting business honestly and professionally.

Essar Energy Transition benefits from carrying out business in a transparent and ethical way. The Leadership Team is committed to implementing and enforcing effective systems to prevent and eliminate bribery in accordance with the Bribery Act 2010.

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

Purpose and leadership

Essar Energy Transition is committed to playing a key role in the decarbonisation of the UK's economy, with ambitious plans to build an energy transition hub at our site in the North West of England and for EET Fuels to develop the leading low carbon process refinery. Essar Energy Transition commissioned an independent, comprehensive strategic review in autumn 2024 and the findings were accepted by the Leadership Team in spring 2025. This confirmed the importance of leveraging Stanlow Manufacturing Complex, a world class asset base, into a platform for sustainable growth to deliver the energy transition.

EET Fuels' vision is 'Performing Today - Transforming for Tomorrow' and the ambition is to ensure a safe workplace, operational excellence and effective major projects delivery. Plans are in place to increase the competitiveness of Stanlow through refinery and commercial optimisation and cost efficiency and decarbonisation.

EET Fuels forms part of Essar Energy Transition, whose ambition is to be a leading producer of low carbon fuels and to establish a blueprint energy transition hub in the North West of England. Essar Energy Transition is playing a major role in accelerating the UK's low carbon transformation, supporting the region's decarbonisation ambitions, and creating highly skilled jobs. The energy transition plans are underpinned by our Environment, Social and Governance (ESG) approach.

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

The EET Fuels' Board

The EET Fuels' Board comprises two executive directors and 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, Nomination and Diversity (RND) Committee. A short biography for each Board Director can be found on our Board of Director webpage.

The Directors who held office during this reporting period are as follows:

- P Ruia
- T Bullock
- A R H Wright (resigned 7 March 2025)
- D K Maheshwari
- M Palios
- N Nayyar (appointed 16 October 2024)
- C A Fountain

The Board meets regularly throughout the year to review performance – with quarterly performance updates provided by the Executive Leadership Team – and deals with matters requiring board approval. The Board also meets with the Executive Leadership Team, as required, to manage the business of EET Fuels. The Board is mindful 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. The Board and individual Directors have a clear understanding of their responsibilities and accountabilities.

This year, we included 'Climate Risk' as a new material risk, elevating it to Board-level oversight and increasing focus on managing climate-related risks and opportunities across the organisation. Updates to material risks feed into the Board's annual strategic review, shaping our business model, financial planning, investment decisions, resource allocation, and long-term strategic direction.

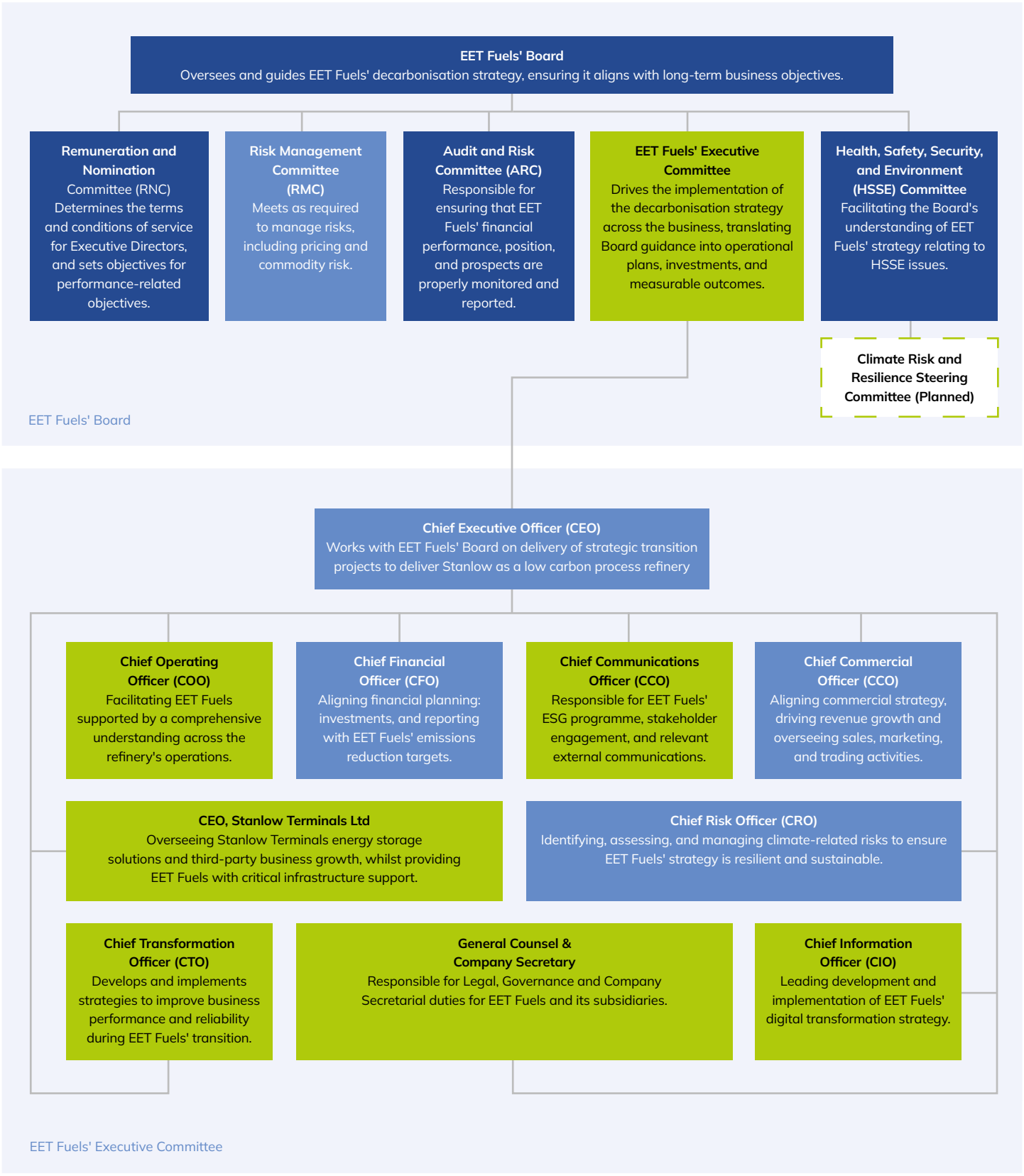
Our Board committees

Certain items of business are delegated to the three principal Board committees: the Audit and Risk Committee (ARC); the RND 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.

The Chief Executive Officer and the rest of his Executive Leadership Team are responsible for implementing the strategy set by the Board and leading the day-to-day running and operations of EET Fuels.

Figure 2 overleaf outlines our governance structure with regards to responsibility for EET Fuels' ESG matters:

Figure 2
EET Fuels' Governance Structure - Organisational Responsibility for ESG



Remuneration Nomination and Diversity (RND) Committee

The RND 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 and Risk Committee:

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

Given potential volatility affecting the sector and EET Fuels, it is necessary for EET Fuels to constantly monitor and evaluate its exposure to uncertainty. To protect EET Fuels 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.

Health, Safety, Security and Environment Committee:

EET Fuels 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 and safety are not overlooked under the pressures of pursuing our strategic objectives, the Board has appointed a HSSE Committee.

The Committee is responsible for providing assistance, recommendations, and reports to the Board, thus facilitating their understanding, reviewing, and monitoring of EET Fuels' strategy relating to HSSE issues. 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 for reviewing our security policy, strategy, and actions. Committee meetings are held no fewer than four times a year, or otherwise as required.

Our Strategy & Business Plan

The Chief Executive Officer and the rest of the 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 against several 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.

Tax Transparency

Tax transparency is important to EET Fuels' operations because it reflects both our governance standards and our economic impact. As an oil and gas refinery, we operate in a highly regulated sector, collecting and remitting significant amounts of excise duty and VAT on fuel sales, paying corporation tax on profits, and participating in the UK Emissions Trading Scheme to account for our carbon emissions. Transparent reporting of these obligations demonstrates our commitment to compliance and responsible contribution to public finances, whilst providing stakeholders with confidence in the integrity of our financial and operational practices.

Through the sale of refined fuels, we collect and remit substantial excise duties and VAT to HM Revenue and Customs. Excise duty in the UK is applied to fuel products such as petrol and diesel at a fixed rate per litre once they leave the refinery for the UK market. This duty is not charged on imported crude oil, but on the finished products supplied domestically. VAT is then applied on top of the fuel price, including the excise duty, and is also collected at the point of sale.

While these taxes are ultimately borne by consumers, our role as a refinery operator is to ensure that they are accurately calculated, collected, and transferred to HMRC. In 2024, this amounted to £3.076 billion in excise duty and £1.161 billion in VAT, demonstrating our role in contributing significantly to UK public revenues. We remain committed to transparency and robust compliance in managing these obligations, supporting both public finances and the integrity of our operations.

In addition to fuel duties, we participate in the UK Emissions Trading Scheme (UK ETS), purchasing allowances to cover our direct greenhouse gas emissions, thereby contributing to national climate policy and supporting the transition to a lower carbon economy. In 2024, our UK ETS contributions totalled £36.02 million at £39.46 per tonne of CO_2 emitted.

Further information regarding EET Fuels' tax transparency can be found in our Tax Strategy, reviewed annually by our in-house Tax Team with any subsequent amendments approved by the Board of Directors.

Appendix

Material metric tables

It is worth noting that some metrics are qualitative in nature and have been discussed accordingly in the main body of the report. Going forward, we will explore opportunities to quantify these metrics where appropriate to better track and demonstrate progress over time.

Environmental Metrics

Metric	Description	Unit	Value	Alignment to UN SDGs
Climate Change Adaptation				
Receptors with high climate sensitivity addressed by current climate change adaptation actions at Stanlow site	The proportion of key site infrastructure susceptible to climate hazards.	% or count	24	Goal 13: Take urgent action to combat climate change and its impacts.
Number of Very-High or High Physical Climate Risks identified at Stanlow site (2030s)	The total count of physical climate risks classified as High or Very High in severity for our Stanlow site based on projected climate conditions in the 2030s.	Count	0	
Number of Very-High or High Physical Climate Risks identified at Stanlow site (2050s)	The total count of physical climate risks classified as High or Very High in severity for our Stanlow site based on projected climate conditions in the 2050s.	Count	0	
Number of Very-High or High Physical Climate Risks identified at Stanlow site (2080s)	The total count of physical climate risks classified as High or Very High in severity for our Stanlow site based on projected climate conditions in the 2080s.	Count	0	
Number of flood-related operational disruptions	The total number of instances where site operations were disrupted due to flooding events.	Count	4	
Duration of flood-related operational disruptions	The total length of time that site operations were disrupted as a result of flooding events.	Count	25	
Pre-incident flood preparedness plan in place	Confirmation of whether a formal plan exists to prepare for and mitigate the impacts of potential flood events before they occur.	Yes/No	Yes	
Flood incident response exercise undertaken	Verification of whether a simulated response exercise has been conducted to test the site's preparedness for flood events.	Yes/No/In develop-ment	In development	
Pre-incident hot weather preparedness plan in place	Confirmation of whether a formal plan exists to prepare for and mitigate the impacts of high-temperature events before they occur.	Yes/No	Yes	

Continued >

Metric	Description	Unit	Value	Alignment to UN SDGs
Climate Change Mitigation				
Total gross Scope 1 emissions	The total direct greenhouse gas (GHG) emissions from sources owned or controlled by the company, expressed in tonnes of CO_2 equivalent.	tCO_2e	1,821,685	Goal 13: Take urgent action to combat climate change and its impacts.
Total gross Scope 2 emissions (location-based and market-based)	The total indirect GHG emissions from purchased electricity, heat, or steam, reported using both location-based and market-based accounting methods.	tCO_2e	16,603	
Scope 1 and Scope 2 GHG emissions	The combined total of direct (Scope 1) and indirect (Scope 2) GHG emissions for the company.	tCO_2e	1,837,747	
Scope 1 and Scope 2 GHG emissions intensity (per tonne of crude oil processed)	The ratio of combined Scope 1 and Scope 2 GHG emissions to the volume of crude oil processed, expressed as tonnes CO_2e per tonne of crude.	tCO_2e/ TCOP	0.21	
Energy Intensity Index (Solomon Index)	A measure of the energy efficiency of operations, expressed as the amount of energy used per unit of production or output.	Solomon Index	103.9	
Progress of fuel switching initiatives	The status and extent of initiatives to replace higher-carbon fuels with lower-carbon alternatives across operations.	Progress Against Plan (Red / Amber / Green)	Green	
Progress of CHP project producing low carbon heat and power	The status and advancement of the combined heat and power project aimed at generating low carbon energy for operational use.	Progress Against Plan (Red / Amber / Green)	Green	
Progress of hydrogen production projects	The status and advancement of projects producing low carbon or green hydrogen to support decarbonisation objectives.	Progress Against Plan (Red / Amber / Green)	Green	
Current versus target emissions reduction trajectory (decarbonisation strategy)	A comparison of actual emissions reductions against planned targets over time, demonstrating alignment with the company's decarbonisation strategy.	% reduction (from baseline of 2.1 MTPA)	13.3%	
Current investment in carbon emission reduction initiatives	The total financial investment made to date in initiatives aimed at reducing carbon emissions across operations.	Currency (USD)	$136m	
Investment in carbon emission reduction initiatives – on plan / off plan	The financial investment allocated to carbon emission reduction initiatives, showing whether projects are proceeding on schedule ('on plan') or falling behind ('off plan').	Progress Against Plan (Red / Amber / Green)	Green	
Expected investment by 2035 carbon emission reduction initiatives	The projected financial investment in planned carbon reduction initiatives up to the year 2035.	Currency (USD)	$3.0bn	

Continued >

Metric	Description	Unit	Value	Alignment to UN SDGs
Air Quality				
Independent air quality monitoring systems in place	Presence and operation of third-party or independently verified systems that continuously monitor air quality at or near site facilities in place.	Yes / No	Yes	Goal 11: Make cities and human settlements inclusive, safe, resilient and sustainable.
Exceedance of public health limits as measured at independent off-site measuring locations	Instances where pollutant concentrations recorded by independent offsite monitoring exceed agreed levels.	Number FY24	28	
Water & Wastewater Management				
Net water usage	The net volume of water consumed. Essar Energy Transition does not operate in a region with high or extremely high baseline water stress.	Cubic metres (m^3), %	7.473,852	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.
Effluent discharge into water	Average annual amount of oil discharged into controlled waters.	Kg / annum	26,610	
Waste & Hazardous Materials Management				
1. Amount of hazardous and non-hazardous water transferred for disposal 2. Amount of hazardous and non-hazardous waste transferred for recovery 3. Waste recovered to quality protocol specification and transferred off-site	The total quantity and composition of waste transferred for disposal and recovery and the proportion recovered to quality protocol specification.	Metric tonnes (t), %	1. 6,965 2. 13,370 3. 12,643	Goal 11: Make cities and human settlements inclusive, safe, resilient and sustainable.
Ecological Impacts				
Footprint of Gowy Meadows nature reserve	The total land area occupied or impacted by the Gowy Meadows nature reserve.	Hectares	160	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.
Future Fuels Development				
Volume of fuels supplied to meet the Renewable Transport Fuel Obligation (RTFO)	The total volume of biofuels and other renewable fuels supplied to meet obligations under the UK Renewable Transport Fuel Obligation (RTFO).	Millions of litres	455	Goal 7: Ensure access to affordable, reliable, sustainable and modern energy for all.
Volume of GHG saved as a result of supplying biofuels under the RTFO	The total volume of GHG savings as a result of supplying biofuels under the UK Renewable Transport Fuel Obligation (RTFO).	tCO_2e	933,165	

Social Metrics

Metric	Description	Unit	Value	Alignment to UN SDGs
Employee Health and Safety				
Time achieved for Triple Goal Zero	The total uninterrupted period during which no personal safety, environmental, or process safety incidents have been recorded.	Weeks	26	Goal 3: Ensure healthy lives and promote well-being for all at all ages.
Total recordable case frequency (TRCF)	Total recordable case frequency (TRCF) is an event frequency indicator.	TRCF	0.68	
Lost time to injuries	The number of injuries resulting in lost time on site due to injury during the period, including business partners working at EET Fuels' manufacturing sites.	Count	3	
Percentage of own workforce who are covered by health and safety management system	The proportion of employees for whom formal health and safety management policies and procedures are applied, expressed as a percentage of the total workforce.	%	100	
Achieve RoSPA Gold (Health and Safety Awards)	Recognition awarded by the Royal Society for the Prevention of Accidents (RoSPA) for excellence in health and safety management and performance.	Yes/No	Yes	
Stakeholder Management				
Programme of engagement initiatives with key external stakeholders (i.e., customers, financial stakeholders, suppliers, regulators, communities, and industry bodies)	The number of initiatives to engage key external stakeholders - including customers, suppliers, regulators, communities, and industry bodies - to foster dialogue and collaboration.	Progress against plan (Red / Amber / Green)	Green	Goal 3: Ensure healthy lives and promote well-being for all at all ages.
Learning and Development				
Health and safety training days delivered	The average number of hours of health and safety training delivered per employee during the reporting period.	Hours / employee	519	Goal 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.
Training sessions completed	The total number of individual training sessions completed by employees across all topics during the reporting period.	Count	4,112	

Continued >

Metric	Description	Unit	Value	Alignment to UN SDGs
Development of Women				
Gender bonus gap Mean / Median	The difference in average (mean) and median bonus payments between male and female employees, expressed as a percentage of male bonuses.	%	31.3% mean) 2.6% (median)	Goal 5: Achieve gender equality and empower all women and girls.
Gender pay gap Mean/Median	The difference in average (mean) and median total pay between male and female employees, expressed as a percentage of male pay.	%	14.6% (mean) 2.4% (median)	
Percentage of female graduates and apprentices	The proportion of workforce who are female.	%	15%	
Community Development & Investment				
Number of grants within the year for the '100 Grants for 100 years' initiative	The total number of financial grants that were given as part of our '100 Grants for 100 years' initiative.	Count	106	Goal 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.
Value of grants within the year	The total monetary value of grants received or awarded within the reporting year (not isolated to our '100 Grants for 100 years' initiative).	Currency (£)	£107,000	

Governance Metrics

Metric	Description	Unit	Value	Alignment to UN SDGs
Critical Incident Risk Management				
Deliver COMAH site-specific incident response exercise	Delivered a site-specific exercise to test and practice incident response procedures in accordance with COMAH regulations.	Yes/No	Yes	Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.
Have COMAH incident response policies in place	Established and maintain documented incident response policies for COMAH-regulated site to manage major accident hazards.	Yes/No	Yes	
Labour Practices & Human Rights				
% of suppliers screened for human rights risks	The proportion of suppliers that have indicated compliance with legal and regulatory requirements.	%	100%	Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.
Published Modern Slavery Statement	Confirmation that a statement has been published outlining measures taken to prevent modern slavery in its operations and supply chain.	Yes/No	Yes	
Colleague whistleblower service in place	Availability of a confidential reporting mechanism for employees to raise concerns about ethics, compliance, or human rights issues.	Yes/No	Yes	
Business Ethics				
Employees completing mandatory Ethics and Compliance training	The percentage of employees who have completed required training on ethics and compliance policies.	%	98%	Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.
Management of the Legal and Regulatory Environment				
Agreements in place to support development and delivery of major energy transition projects directly requiring UK HMG's support	The presence of formal agreements established to facilitate the development and implementation of major energy transition projects that directly involve support from the UK Government.	Progress Against Plan (Red / Amber / Green)	Green	Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.
Grievance process in place for external stakeholders	A formal procedure allowing external stakeholders to raise concerns or complaints regarding the company's operations, with mechanisms for review and resolution.	Yes / No	Yes	

Get in touch

Essar Energy Transition (EET)
Stanlow Manufacturing Complex,
Ellesmere Port, Cheshire,
CH65 4HB,
United Kingdom

Tel: 0151 350 4000 www.essarenergytransition.com