

# Harmony Energy Limited Group of Companies

## Environment Policy

Approved and adopted by the Board of Directors of Harmony Energy Limited on 1 December 2025

### Introduction

The Harmony Energy Group of Companies (“Harmony Energy”) develops, builds, owns and operates grid-scale battery energy storage systems (BESS) and renewable energy generation projects to help achieve a more environmentally, socially and economically sustainable future.

Our projects contribute to climate change mitigation by enabling the integration of more electricity from renewable sources into the electricity grid and reducing reliance on fossil fuel-based power generation, thereby supporting the decarbonisation of the energy system.

In delivering renewable energy infrastructure projects, we recognise that our activities, and those of our suppliers, impact on the environment. This Environment Policy (the “Policy”) sets out our commitment to operate in an environmentally sustainable way. This means we conduct our business in accordance with relevant environmental laws and regulations, but also that we operate to the high standards we set for ourselves, outlined in this Policy. We strive to minimise adverse environmental impacts and, where possible, maximise positive outcomes through our activities. We commit to continuously strengthening our environmental management systems and processes to improve environmental performance.

### Scope

This Policy applies to all majority-owned Harmony Energy companies, subsidiaries and SPVs, as well as suppliers from the date of adoption.

This Policy is embedded in our Supplier Code of Conduct, which all key suppliers are expected to adhere to.

Where Harmony Energy operates internationally, this Policy will be applied, subject to legal or regulatory requirements of the relevant international jurisdiction, and relevant local policies and supporting procedures.

### Governance

The Board of Directors has ultimate responsibility for and oversight of this Policy.

### Roles and responsibilities

This Policy applies to all colleagues across the Harmony Energy Group of Companies - both permanent and non-permanent workers, and anyone working on behalf of Harmony Energy.

- **The Board of Directors** has ultimate responsibility for setting Harmony Energy’s environmental sustainability approach, commitments and Policies.
- **The Sustainability Committee** oversees, monitors and reviews Harmony Energy’s environmental sustainability approach and performance and makes recommendations to the Board on sustainability matters.
- **The Group Sustainability Team**, led by the Head of Sustainability, is responsible for integrating the Environment Policy and associated activities into key business areas and

measuring, monitoring and reporting on environmental sustainability performance. The Group Sustainability Team advises the Board, the Sustainability Committee and business functions on environmental sustainability matters.

- **Teams and Business Units** are responsible for integrating the Environment Policy, approach and associated initiatives into their activities.
- **Managers** are responsible for making sure that their teams understand and comply with this Policy, supporting procedures as well as complete any relevant training.
- **All employees** must comply with the Policy and supporting procedures and complete all relevant training.

### Policy principles

This Policy sets out our commitment to conduct our business in accordance with relevant environmental laws and regulations, but also to operate to the high standards we set for ourselves through the following policy principles:

- **Climate change and greenhouse gas emissions**

While Harmony Energy's projects contribute to climate change mitigation by supporting the decarbonisation of the electricity system, we also take responsibility for the greenhouse gas ("GHG") emissions associated with our activities.

We are committed to measuring and reducing our operational and supply chain emissions annually. This includes reducing the lifecycle GHG impact of our sites and equipment, as well as decarbonising our offices, events and travel.

We will assess climate change risks and opportunities associated with our activities and ensure appropriate adaptation measures are in place to respond to climate change.

- **Energy**

We are committed to reducing our energy consumption and improving the energy efficiency across our operations, including our sites, offices and travel. We strive to procure equipment that meets the highest energy efficiency standards and to work with suppliers that implement energy efficiency processes to produce the equipment.

Harmony Energy promotes the use of low carbon energy sources across our activities and the adoption of renewable energy more widely in the energy system.

- **Water**

Recognising that our activities impact on water through our operations and through our supply chain, we are committed to promoting responsible water management.

During the project design phase, this includes integrating appropriate water drainage systems and flood risk controls. During the construction and operational phases, water discharge is managed responsibly to prevent flooding and water pollution.

In the supply chain, raw material (particularly lithium) extraction and processing can be a water intensive process and can lead to water scarcity and pollution of local water sources. We are committed to working with suppliers to promote more sustainable and efficient raw material extraction and processing practices.

- **Resources, circularity and waste**

We are committed to preventing and minimising the consumption of resources and production of waste across our projects and operations, as well as sourcing materials that have a sustainable lifecycle impact.

We adopt circular practices and implement the waste hierarchy, prioritising waste prevention, followed by re-use, recycling, recovery, and finally disposal. We ask our suppliers, service providers and other business partners to follow the same approach.

- **Pollution**

We are committed to preventing pollution, including air, water, soil and noise pollution resulting from our operations and supply chain.

- **Biodiversity and nature**

We are committed to reducing the negative impacts of our activities on nature, to protect, preserve and enhance biodiversity and minimise nature dependencies. For UK sites, the mandatory 10% biodiversity net gain target should be exceeded where possible. Sites in other jurisdictions should avoid a biodiversity net loss, and where possible, achieve a biodiversity net gain of at least 10% for all new sites.

Harmony Energy will safeguard protected species and habitats, identify biodiversity-sensitive areas, and comply with our legal and planning commitments and we ask suppliers, service providers and other business partners to meet the same standards.

- **Other environmental impacts**

We are committed to identifying, assessing and mitigating other negative impacts of our activities on the local environment, for instance through controlling dust, noise, and visual impacts, and ask suppliers and contractors to do the same.

## **Reporting**

Environmental performance indicators and incidents will be reported to the Board quarterly and externally annually.

## **Review**

Harmony Energy commits to reviewing the content of this Policy at least annually to ensure its effectiveness. Any revisions will be recommended to the Board for consideration and approval.

## **Supporting documents**

- Sustainable Travel Policy
- Supplier Code of Conduct