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POWERING A SUSTAINABLE FUTURE

Sustainability Report 2025

December 2025





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In today's world, sustainability is not just a promise, it's the foundation of a better future. At ESP Utilities Group, we're committed to delivering resilient, low-carbon networks that support communities and protect our planet.

With over one million connections already serving homes and businesses across the UK, this Sustainability Report represents a key milestone in our ongoing journey to transparently share our progress, impact, and ambitions.

Over a million
connections across
the UK – **powered by
sustainable practices.**



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At ESP Utilities Group, we recognise that our ambition to be the network adopter of choice goes hand in hand with a commitment to operate responsibly for people, for communities, and for the planet.

Our success is founded on strong, collaborative relationships with our customers, our people, and our investors. Together, we are delivering networks that offer long-term value while upholding high standards of environmental, social, and ethical responsibility.

Guided by our core values of Transparency and Excellence, we are proud to present our second Sustainability Report, a reflection of our progress so far, our impact today, and the goals we've set for a more sustainable future.

As we advance our Sustainability Strategy, we are committed to reporting annually on our performance and progress. This ensures our stakeholders have a clear, honest view of how we are building resilient communities, fostering innovation, and creating lasting, positive change across the UK.

Kevin O'Connor, December 2025



“ Sustainability in utilities means delivering reliable service today, while ensuring the resources that power tomorrow remain strong.”





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OUR SUSTAINABILITY STRATEGY

OUR SUSTAINABILITY VISION

ESP is dedicated to adopting and operating gas, electricity, clean, and wastewater networks across Great Britain, with over 1.1 million customers already being served by our networks. Our continued growth and development stems from strong, collaborative relationships with our construction partners and a foundation of rigorous governance, auditing, and maintenance standards.

Our sustainability approach targets areas where we can make a measurable impact, aiming to provide lasting benefits to our customers, employees, and the environment by:



Delivering utility connections to new homes providing UK housebuilders with critical infrastructure options.



Providing a collaborative and developmental work environment where our team members can develop, thrive, and contribute to shared goals.



Caring for priority residential customers to ensure that vital services remain at a high standard and are reliable.



Implementing innovative solutions to support developers to deliver against their net zero targets.



Delivering EV charging Infrastructure supporting the UK's move to low-emissions road transport



Employing stringent governance processes to ensure responsible operations that promote sustainable, long-term growth.

OUR STRATEGIC SUSTAINABILITY PILLARS

Our sustainability strategy is anchored on three foundational pillars:



SUSTAINABLE

We are a safe and innovative operator, committed to investing in our planet's future.



DIVERSE

We champion inclusivity, diversity and development, investing in our people.



RESPONSIBLE

We are a trusted corporate citizen, investing in our communities, working toward a brighter tomorrow.

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OUR SUSTAINABILITY STRATEGY

SUSTAINABLE

Investing in safety and innovation to power a greener, more resilient tomorrow.



Image Credit: Osprey Charging Network

The health, safety, and wellbeing of our people, partners, and the communities we serve remain at the heart of everything we do.

Under the guidance of the Health and Safety Executive, we continue to strengthen a proactive safety culture, one that encourages open reporting, continuous learning, and the prevention of incidents before they occur.

In collaboration with our construction partners, we design and deliver modern, efficient networks built to stand the test of time. Through regular audits and ongoing engagement, we ensure every project upholds a high standard of safety, quality, and care.

SUSTAINABLE

Ambitious, Paris-aligned carbon reduction targets, independently verified for transparency and impact.

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Our sustainability strategy focuses on impactful initiatives that create lasting environmental, social, and economic benefits for people, communities, and the planet, including:

13 CLIMATE ACTION



9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



MEASURING & REDUCING CARBON EMISSIONS

- ✓ We have set ambitious, externally verified, Paris-aligned carbon reduction targets. We have been actively monitoring and reducing Scope 1 and Scope 2 emissions across our operations, since 2018 as part of our Global Real Estate Sustainability Benchmark (GRESB) submissions.
- ✓ As part of our ongoing focus on managing the risks and opportunities that climate change brings, we will embed climate risk – and opportunity – into our corporate risk assessments. Guided by the Task Force on Climate-Related Financial Disclosures (TCFD) requirements, these include physical risks – from acute climate-related extreme weather events – and transitional risks – including changes to regulatory frameworks.
- ✓ We achieved ISO 14064-1 certification, marking a significant step toward validated carbon reductions to continually align with our GHG reduction goals. For results using 2022 as our baseline year, see the Emissions Measurement, Reporting and Reduction section.
- ✓ We will measure and report our sustainability actions and activities transparently, setting short and long-term goals designed to track progress across each strategic area.

ISO 14064-1 certified for carbon reduction since 2022.

The achievements noted in this section have been measured against the United Nations SDG indicators: THE 17 GOALS | Sustainable Development

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7 AFFORDABLE AND CLEAN ENERGY



EMPOWERING ELECTRIC TRANSPORT

- ✓ We lead the way in rolling out infrastructure for electric vehicles (EVs) across the UK. From EV charge points in residential areas to bus garages, retail parking, motorway service areas and forecourts, we're reducing emissions and noise pollution while enabling a cleaner future.

11 SUSTAINABLE CITIES AND COMMUNITIES



BUILDING NETWORKS FOR A LOW-CARBON TRANSITION

- ✓ Our electricity networks are expanding to support low-carbon heating solutions, while our modern gas networks can transport up to 100% hydrogen blends, aligning with COP28 goals for phasing out fossil fuels. We have also developed a plan and are in the process of broadening our portfolio to include heat networks for decarbonised heating in homes.



14 LIFE BELOW WATER

CONSERVING WATER THROUGH SUSTAINABLE DRAINAGE

- ✓ We promote Sustainable Drainage Systems (SuDS) in developments and actively encourage developers in their use. Our commitment to implement SuDS which separate foul and surface water systems to reduce sewer outflows supports more sustainable urban water use.



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In 2025 we maintained our 100% safety records with no major injuries or environmental incidents.

3 GOOD HEALTH AND WELL-BEING

KEY ACHIEVEMENTS

✓ Zero fatalities or major injuries. In 2025, we recorded no fatalities or major incidents, demonstrating our unwavering commitment to safety. We have maintained a record of zero fatalities throughout our 25 years in business. We remain dedicated to monitoring near misses and continuously improving safety practices to uphold high standards of care.

13 CLIMATE ACTION

✓ Zero significant environmental incidents. We had no environmental incidents in 2025 and continually monitor our environmental impact.



7 AFFORDABLE AND CLEAN ENERGY

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

11 SUSTAINABLE CITIES AND COMMUNITIES

125 EV charging sites adopted in 2025, supporting cleaner transport.

✓ Electric Vehicle charging expansion. As of December 2025, we've added over 100 charging sites, contributing to the expansion of the UK charging network.



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OUR SUSTAINABILITY STRATEGY

DIVERSE

Championing inclusivity,
development and growth



Our people are at the heart of ESP's success. We're committed to fostering a welcoming and supportive workplace where every employee feels valued and empowered to grow.

By investing in our team's development and wellbeing, we're cultivating a workplace that reflects our core values and enables collaboration, innovation, and high performance across the organisation

OUR SUSTAINABILITY STRATEGY

DIVERSE

Our approach to diversity and inclusivity includes key initiatives that provide social and economic benefits to our team, including:

8 DECENT WORK AND ECONOMIC GROWTH



CREATING A SUPPORTIVE & FLEXIBLE WORKPLACE

- ✓ In response to changing workforce needs, we introduced flexible hybrid working options, offering our employees greater work-life balance.
- ✓ All team members have access to a comprehensive Employee Assistance Programme, providing support and resources for personal and professional challenges.
- ✓ We offer flexible benefits, including universal private medical care for all employees, underscoring our commitment to their health and wellbeing.

EMPOWERING PERSONAL & PROFESSIONAL GROWTH

- ✓ We offer a range of learning programmes, from professional qualifications to unconscious bias training, building a culture of continuous improvement.
- ✓ Our 'Step Up' management training programme has a proven track record in developing high-performing employees. Now in its fifth year, It includes career coaching, 360-degree appraisals, and mentorship, providing tailored growth opportunities. See our Staff engagement section for more details.
- ✓ We support learning at all career stages with apprenticeships, graduate programmes, and monthly training sessions to build skills, engagement, and confidence.



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DIVERSE

8 DECENT WORK AND
ECONOMIC GROWTH



CELEBRATING AND RECOGNISING DIVERSITY

- ✓ We celebrate our diversity through a cultural calendar, promoting awareness and inclusion across our workforce.
- ✓ Regular staff feedback forums ensure that every voice is heard, with feedback shaping our policies and initiatives.
- ✓ Through our core values – Be Transparent, Be Excellent, Be Ambitious, Be Respectful, and Be Collaborative – we encourage and reward behaviours that strengthen our culture and create a sense of belonging.

**We are committed to building
a culture of continuous improvement.**

5 GENDER
EQUALITY



8 DECENT WORK AND
ECONOMIC GROWTH



KEY ACHIEVEMENTS

- ✓ Gender profile reporting. We actively report on the gender profile of our team, promoting transparency and progress in our diversity efforts. *See Appendix 1 for our 2025 gender ratio.*
- ✓ Employee satisfaction and inclusion. We conduct regular satisfaction surveys and annual Diversity & Inclusion surveys, acting on feedback to ensure a positive and inclusive environment.
- ✓ Enhanced benefits. We recently raised holiday entitlements to 26 days for everyone and introduced policies for IVF support, maternity, and paternity leave, aligning our benefits with our people's needs.



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RESPONSIBLE

Building stronger communities through integrity and dedication

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We recognise that our role as a network provider extends beyond infrastructure. We are accountable not only to our customers but also to our employees and the communities we serve.

By maintaining high standards in compliance, customer service, and corporate governance, we ensure our operations embody our core values: transparency, integrity, and social responsibility. Our comprehensive three lines of defence, operational teams, management oversight, and independent audits — guarantee accountability and proactive risk management at every level.

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Our commitment to responsible operations includes:

8 DECENT WORK AND ECONOMIC GROWTH



PROMOTING RIGOROUS COMPLIANCE AND OPERATIONAL IMPROVEMENT

- ✓ We have established rigorous KPI monitoring at the operational level, including water quality checks, and conduct systematic root cause analyses to prevent recurrence of issues. Through continuous process improvement, we ensure strict compliance with regulatory requirements and consistently uphold the standards expected by our stakeholders.

8 DECENT WORK AND ECONOMIC GROWTH



SUPPORTING OUR COMMUNITIES

- ✓ Since launching our volunteering initiative in 2023, we have empowered employees to make a meaningful impact in their communities through paid volunteer days.
- ✓ By aligning with the Global Real Estate Sustainability Benchmark (GRESB), we actively measure and strengthen our environmental, social, and governance (ESG) performance. This commitment allows us to tackle industry challenges head-on while driving positive change for our stakeholders and the communities we serve.



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8 DECENT WORK AND ECONOMIC GROWTH



10 REDUCED INEQUALITIES



INTEGRITY AND RESPECT: THE CORNERSTONES OF OUR WORKPLACE



Regular company meetings keep our employees informed on key business matters, while our active LinkedIn page highlights achievements and milestones to the wider community. Our policies are easily accessible to all team members, fostering an open, transparent, and informed workplace culture.



Our Dignity at Work policy ensures a respectful and inclusive environment. During new employee inductions, we reinforce our zero-tolerance approach to discrimination, supported by clear policies and a defined disciplinary process. To further support inclusivity, we provide a quiet room for prayer and meditation and maintain a diverse cultural calendar that reflects and celebrates our team's varied backgrounds.

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



SUSTAINABLE PARTNERSHIPS & PROCUREMENT



We use our position to encourage best practices and transparency within our supply chain. By working closely with our partners, we help drive sustainable procurement policies and responsible industry standards.



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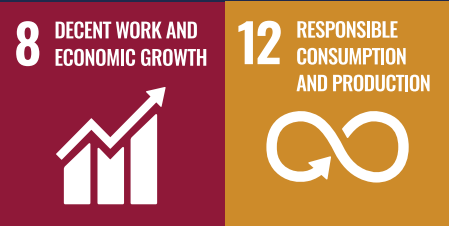
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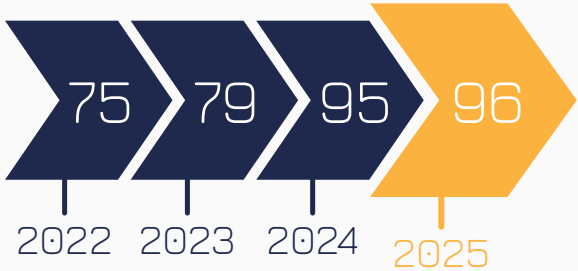
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KEY ACHIEVEMENTS

- ✓ Increased GRESB score. Our Global Real Estate Sustainability Benchmark (GRESB) score has improved year on year since our first report in 2018. This year, we achieved a score of 96 (vs 95 in 2024), reflecting our dedication to responsible operations and sustainable practices. See the Emissions Measurement, Reporting and Reduction section for more details.
- ✓ Year-on-year reduction in compliance failures. We continually refine processes and address root causes, reinforcing our commitment to compliance.
- ✓ Effective customer complaint management. Year to November, we have received 533 complaints. Using 2024 as our baseline year, we are focused on tracking and reducing complaints to improve customer satisfaction.
- ✓ Community volunteering. We've already surpassed last year's volunteering days, reinforcing our commitment to community support.

PARTICIPATION & SCORE



Year-on-year progress – our GRESB score rose to 96 in 2025, up from 95.





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EMISSIONS MEASUREMENT, REPORTING & REDUCTION

In our commitment to a sustainable future, we have taken measurable steps to track, reduce, and transparently report our carbon emissions. In 2024, we became a Toitū carbonreduce certified business, achieving certification under ISO 14064. This significant milestone confirms our alignment with rigorous global emissions reporting standards, and our dedication to reducing our programme-mandated annual emissions year-on-year.



**Measured emissions to
ISO 14064-1:2018**



**Managing and reducing
carbon emissions
Programme requirements**

Our emissions data establishes 2022 as our baseline year, with annual reporting to follow, ensuring stakeholders can track our progress. We're addressing emissions across categories, with a focus on reducing the most controllable sources, such as emissions from transport. This systematic approach allows us to manage our carbon footprint and align with our sustainability goals.

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Reducing carbon
emissions offers
significant benefits
for businesses,
customers, and our
collective future.

CONSOLIDATION APPROACH

Organisational boundaries were set according to the methodology described in the GHG Protocol and ISO 14064-1:2018 standards. We have one office building and no subsidiaries or joint ventures.

We calculated our emissions using an operational control consolidation approach. Our annual sustainability reports will highlight our year-on-year progress with comparative statistics.

See Appendix 2 for a detailed table on our 2022 base year and our Greenhouse Gas Emissions (GHG) for the 2022 period.



Toitū lead and guide positive change with a system of internationally recognised environmental programmes, based on science and backed by evidence. They help businesses realise efficiencies, reduce their carbon footprint, and be more sustainable.

EMISSIONS MEASUREMENT, REPORTING & REDUCTION

REDUCTION TARGETS

We are committed to managing and reducing our greenhouse gas emissions, in line with the Toitū Carbon Reduce programme. Recognising the immediate opportunity to lower emissions from petrol and diesel vehicles, we've set short-term targets for a steady reduction. This phased approach allows us to make manageable changes as company car leases renew for a smooth transition to lower-emission options.

Looking forward, we are focusing on key initiatives to further reduce our emissions:



Improving efficiency of electricity distribution networks

To reduce energy losses, we are implementing low-loss transformers across our networks. Additionally, we're collaborating on an Ofgem-funded innovation project to explore the impact on losses and potential benefits of reconfiguring low-voltage networks and load shifting.



Promoting electric and hybrid vehicles

As well as expanding EV options in our company car list as leases expire, we are supporting all employees with an EV scheme available through salary sacrifice, and providing financial assistance for home chargers, helping our people make sustainable transport choices.





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STAKEHOLDER ENGAGEMENT

We value collaboration and transparency with stakeholders across the sector. Through partnerships, active participation in industry organisations, regulatory engagement, and ownership oversight, we strive to promote high standards, share best practices, and contribute meaningfully to the evolving landscape of network services.

Commercial

Our customers are at the heart of everything we do. We strive to create an experience where every customer feels valued, supported, and understood as they engage with our services. By anticipating needs and working collaboratively, we aim to exceed expectations, delivering practical, innovative solutions that empower our customers to achieve their goals.

Regulators

We maintain regular engagement with regulators and policymakers across Gas, Electricity, Water, and Heat networks. Through open, two-way dialogue, we share insights on our business performance and collaborate to help shape policies that support shared government and regulatory goals.

Independent Networks Association (INA) membership

We have been actively engaged with the sector's trade body, the Independent Networks Association (INA), since its formation. Our Regulations Director currently serves as Chair, reflecting our ongoing commitment to supporting and collaborating with the wider industry.

We also contributed significantly to the development and implementation of the INA Customer Commitment; a framework aimed at enhancing customer service standards across the sector. For more details, see our Customer Service section.

Ownership and governance

ESP is managed by 3i Managed Infrastructure Assets (3i MIA) on behalf of two national pension funds, with independent oversight from four non-executive 3i directors on our Board as well as an independently appointed chair.

This structure promotes transparency, supports objective decision-making, and provides valuable insights that inform our strategic direction.

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We are committed to being a socially responsible organisation, supporting charities that match our values and encouraging employee involvement. As part of our culture of giving, we provide each team member with a paid volunteering day, helping them make a positive impact in our communities and strengthening team bonds.

Our community engagement includes hands-on, dedicated volunteering, fundraising, and direct donations each year. Just some examples include:

Volunteering

Several volunteers rolled up their sleeves, volunteering for a local charity, transforming outdoor spaces by clearing the grounds, and rejuvenating the greens back to a state of glory.





CHARITY ENGAGEMENT

Fundraising

Our Teams are very passionate about supporting our charity and giving back to the community. It's something both they and ESP as a whole take great pride in!

Matched Funding

We are proud to support our team with their charity sponsorships and offer matched funding where we match their final amounts toward their cause.



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CHARITY ENGAGEMENT

Supporting Local Charities

This September, several of ESP employees took part in the 10k Fun Run/Walk.

They raised £2.5k to support the work of a local charity. Every step they all took in this 10k is to help those who need it most.

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Throughout the run, 10k runners sampled two incredible award-winning English wines to try along the course at five different drinks stations.

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Engaged employees are essential to our success. We actively seek feedback from our team to ensure a supportive, inclusive, and responsive work environment. Through a variety of engagement initiatives, we are committed to listening, acting, and continuously improving our workplace.



New starter surveys

To ensure a positive first impression, we gather feedback from all new joiners within their first five weeks. The HR team regularly reviews this input to identify areas for improvement and strengthen our onboarding and induction process.



Exit interviews

Our HR team conducts exit interviews with all departing employees, gathering valuable feedback that helps us understand and address factors impacting retention.



Diversity & Inclusion (D&I) survey

Annually, we gather insights on our D&I initiatives through a company-wide survey. Results are discussed by the executive team and shared with staff in the next company meeting, ensuring transparency on follow-up actions.



Monthly townhall talks

Each month, our CEO hosts a townhall to provide updates on company progress and answer questions. This open forum allows team members to stay informed and connect with the leadership team.



Biennial employee surveys

Every two years, we distribute surveys via our MyRewards platform, offering all staff the opportunity to share feedback on their experience at ESP. The executive team carefully reviews the results and takes action based on the feedback.



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EMPOWERING PROFESSIONAL, PERSONAL & SUSTAINABLE GROWTH

At the heart of our sustainability strategy is our people. From professional development to wellbeing and inclusion, our HR-led initiatives are designed to foster a culture of continuous learning, engagement, and responsible growth.

We offer a diverse range of learning programmes, including accredited professional qualifications, apprenticeships, and graduate schemes. Our monthly training sessions span topics such as leadership, communication, Neurodiversity, and Mental Health Awareness – ensuring development is accessible at all career stages and aligned with inclusive and sustainable practices.

Our flagship 'Step Up' management development programme, now in its fifth year, continues to build a strong pipeline of future leaders. With structured elements such as career coaching, 360-degree feedback, and mentorship, the programme supports not just individual growth but also reinforces a high-performance and values-driven culture.

We are also embedding sustainability into learning, through planned environmental awareness modules and promoting low-carbon working practices (e.g. digital-first collaboration, flexible working). These efforts contribute to reducing our environmental footprint while supporting employee wellbeing and work-life balance.



STAFF ENGAGEMENT

WELLBEING, SUPPORT
& SOCIAL VALUE

We are committed to supporting employee wellbeing as part of a holistic approach to sustainability.

Our enhanced Sickness Policy reflects our compassionate culture, providing additional support for those facing serious health challenges – above and beyond standard company sick pay.

We also encourage sustainable commuting and healthier lifestyles through initiatives such as:



Cycle-to-work schemes



Flexible and hybrid working options



A hybrid-only company car policy for essential users, helping to reduce emissions



Car sharing among staff, especially as many employees live locally – promoting community, reducing individual travel costs, and lowering our collective carbon footprint



Looking ahead, we aim to introduce:



Climate-conscious learning modules as part of induction and ongoing development



Green employee networks to support local volunteering and environmental action



A sustainability dashboard to track and report on HR's impact, including training, commuting trends, and engagement in green initiatives



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CELEBRATING DIVERSITY & CULTIVATING INCLUSION

We are proud of our diverse workforce and celebrate this through a cultural calendar that promotes inclusion, learning, and cross-cultural appreciation throughout the year.

Our values – Be Transparent, Be Excellent, Be Ambitious, Be Respectful, and Be Collaborative – underpin every aspect of our culture. These are actively brought to life through our monthly THT (Town Hall Talk) sessions, each one focused on one of our core values, helping to reinforce shared purpose and behaviours across teams. We also recognise and reward behaviours that reflect these principles, helping create an environment where everyone can thrive.



Regular staff feedback forums and engagement surveys ensure every voice is heard. Insights from these sessions shape our policies, initiatives, and benefits – driving continuous improvement in employee experience and organisational performance.

We also view DEI as a key component of our sustainability strategy. We actively report on gender representation (see Appendix 1 for 2025 data), conduct annual Diversity & Inclusion surveys, and maintain full transparency in our progress towards equitable outcomes.



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STEP UP PROGRAMME

With 11 participants this year, the Step Up programme supports and accelerates the careers of high-performing team members who show strong potential and ambition to advance. Launched in 2020, the programme is now entering its fifth year and has become a core part of our commitment to developing future leaders. Each cohort of participants embarks on a one-year journey, starting in December and concluding with a graduation dinner the following November.

This multi-faceted programme includes a range of elements to equip participants with the skills and insights needed to succeed:



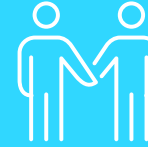
Career coaching

Provides personalised guidance to help participants plan their career development.



Step Up lunches

These informal gatherings offer participants a chance to connect with senior leaders in a relaxed, social setting.



Mentorship

Each participant is paired with a senior manager mentor who offers support, advice, and insight into career progression.



Readiness for management programme

A series of 10 modular sessions focused on developing both personal and management skills.



360-degree appraisal

Gives participants a well-rounded perspective on their strengths and areas for growth by comparing self-assessment with feedback from colleagues.

Since 2020, **37 Step Up graduates have been promoted** and stayed with the company, demonstrating the programme's effectiveness in preparing talent for greater responsibilities. Step Up not only nurtures our current team but also attracts high-calibre candidates looking to grow their careers.



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APPRENTICESHIP
PROGRAMME

Launched in January 2024, our Apprenticeship Programme combines hands-on job training with academic study to develop well-rounded, skilled professionals. Currently supporting one participant, this programme aims to:

	Bring different perspectives into the business		Strengthen team retention
	Attract top talent and enhance diversity		Improve team performance and productivity
	Develop skills, increase engagement, and boost confidence		Create clear career pathways

CUSTOMER SERVICE

Th!nk Customer

In early 2025, we launched our new Th!nk Customer campaign, rooted in our core values to create a culture that prioritises customer needs and strengthens our business relationships.

This initiative is supported by targeted training and promotional materials to embed a seamless, customer-centric mindset across our organisation.

We are dedicated to delivering a customer-first approach that not only meets but exceeds the expectations of our customers, regulators, and stakeholders. In 2025, our commitment to enhancing the customer experience remains at the heart of our operations, guiding how we innovate, collaborate, and create long-term value. This focus extends across every partnership and business relationship, ensuring that sustainability, transparency, and service excellence shape everything we do. Our initiatives continue to evolve driving positive environmental and social impact while delivering a seamless and responsible experience for all those we serve.



Be Respectful

We are ALL responsible

We will always...

- Follow through and follow up
- Put ourselves in the customer's shoes
- Provide service with a smile
- Live our shared values
- Treat everyone fairly and equally with respect



Be Ambitious

We enjoy what we do

We will always...

- Be innovative in our thinking
- Lead by example and BE the example
- Take pride in our service
- Keep a positive mindset
- Strive to be better



Be Transparent

We communicate openly and honestly

We will always...

- Be positive and professional and avoid jargon
- Be honest and upfront about the situation and won't hide behind e-mail
- Explain our processes clearly with regular updates
- Guide the customer to achieve a shared outcome



Be Excellent

We are experts

We will always...

- Train our people to the highest standards
- Empower our people to do what is best for the customer
- Encourage a 'can do' mindset
- Work on improving our systems and processes
- Prioritise what is right for the customer



Be Collaborative

We enjoy what we do

We will always...

- Come together to keep our promises
- Cooperate with each other
- Hold each other to account
- Work together to get the best outcome, aiming to get it right first time
- Actively listen to understand our customers' needs

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CUSTOMER THERMOMETER

Understanding customer feedback is essential to improving our service. To capture real-time insights, we've implemented Customer Thermometer, a one-click survey app that lets customers quickly share their satisfaction levels. Each response is assigned a 'temperature rating' that we can track over time, helping us identify trends, measure customer satisfaction consistently, and act where needed. In the future, we also aim to integrate Customer Thermometer with our CRM system, enhancing our ability to monitor and report customer feedback and implement data-driven improvements.

INA CUSTOMER COMMITMENT



As part of our active role within the Independent Networks Association (INA), we helped develop – and have signed up to the INA Customer Commitment, adopting its standards as part of our service approach. This commitment has been audited by the INA, allowing us to share best practices and identify areas for continuous improvement across the industry. To ensure high-quality service, we also participate in the INA Customer Working Group and collaborate with the Energy Networks Association (ENA) Safeguarding Customer Working Group.





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OUR CUSTOMER PROMISES

We are committed to setting a high standard of customer service, driven by the following promises:

- We prioritise customer service at every level of our business, with a leadership team that champions this focus in business decisions.
- We strive to make it easy for customers to communicate with us and access the information they need.
- If issues arise, we are committed to resolving them quickly and learning from the experience to improve.
- We proactively work with industry peers and our regulators to ensure our systems and processes evolve to meet the future needs of independent network customers.

SUPPORTING CUSTOMERS' NEEDS

- We proactively and regularly contact our customers to understand their diverse needs, especially priority and vulnerable customers.
- We provide guidance on where customers can access additional support, both through ESP and external organisations.
- For both planned and unplanned outages, we will provide information early to help customers prepare, highlight available support and update them when services will be restored.
- We are committed to promoting best practice and engage with colleagues across INA member companies, reinforcing quality and continuous improvement across the industry.

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GUARANTEED STANDARDS OF PERFORMANCE

We are committed to meeting regulated standards of service, including timely reconnections after power outages and punctual attendance for scheduled appointments. In cases where we fall short of these standards, we compensate affected customers under the Guaranteed Standards of Performance.

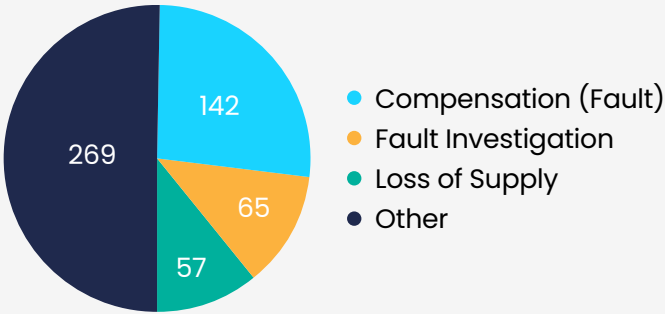
Compensated customers in 2024 and 2025 as of October 2025

2024	Q1	Q2	Q3	Q4
Figures	173	540	141	-

2025	Q1	Q2	Q3	Q4
Figures	429	224	241	1

CUSTOMER COMPLAINTS

Improving our customer service is a top priority, and we take all complaints seriously. In addition to resolving specific issues, we investigate the root causes to help us better serve our customers. As of November 2025, we received 533 complaints, mostly relating to our electricity networks, especially around unplanned and planned power cuts during storms earlier in the year. We are working on breaking this down for better insight for 2025/2026.



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GOVERNANCE

The Group's corporate governance structure has been designed to align with the UK Corporate Governance Code, and the Walker Guidelines. Although the Group has no requirement to comply, the Board aspires to achieve the levels of corporate governance included within these guidelines.

The Group's Board meet on a monthly basis to review the business' performance and discuss strategic objectives and decisions of the Group. The Directors take decisions for the long-term goals of the Group, recognising the importance of considering the impact to our wider stakeholders.

The Group is governed through its Board, and supported by its Executive Committee. Both the Board and the Executive Committee have extensive experience within the utilities and infrastructure asset management sector which are critical to support sound business decisions.



Corporate governance policy

Our corporate governance policy applies to all Directors, employees, and contractors, reinforcing a consistent approach to ethical business conduct and regulatory compliance. Our Board is responsible for leading and guiding the Group, overseeing strategy, budget, major capital expenditures, acquisitions, and senior appointments.

The Board's four core principles for effective governance are:

- **Commitment** to establishing a robust compliance programme.
- **Implementation** of the compliance programme, including ongoing education and maintenance.
- **Monitoring and measuring** through reporting and supervision.
- **Continual improvement** via regular review and enhancement of the compliance programme.

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Three lines of defence

Our governance approach includes a three lines of defence compliance model:

- 1. First line:** Operational teams implementing and meeting controls.
- 2. Second line:** Our Compliance and Regulatory Team support Operational Management in providing oversight.
- 3. Third line:** Internal and external auditors ensure independent assurance.



Key policies

We uphold high standards of integrity, transparency, and accountability across our operations.

In 2025, our governance framework continues to evolve to meet changing expectations and strengthen trust among our customers, regulators, and partners. Guided by robust policies on anti-bribery, whistleblowing, and modern slavery, our Board reviews and approves these measures annually to ensure they remain effective and forward-looking. Every team member completes regular training, reinforcing a culture of ethical practice, responsibility, and continuous improvement throughout our organisation.



Risk management

Proactive risk management is embedded in our culture and underpins our long-term resilience and efficiency.

Our formal Risk Methodology supports both the Group and departmental risk registers, enabling us to identify, assess, and manage risks that could affect our performance including environmental and operational risks.

A clearly defined authority matrix governs escalation and approval processes, ensuring accountability and transparency in decision making.

The Board and Executive Team regularly review and monitor both registers and the matrix to maintain robust oversight. We ensure compliance with Health and Safety requirements and our Regulatory Licence Obligations through quarterly reporting to the Executive Committee, with the Board conducting comprehensive reviews twice a year. Employees are kept informed and engaged in our risk management processes, with many contributing directly to day-to-day risk identification and mitigation.

Our Health and Safety Committee plays a central role in promoting a safe workplace culture reviewing hazard and near-miss reports from across the business, sharing insights with the Executive Committee each month, and driving continuous improvement in our safety performance.



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Cyber security

We take cyber security seriously and continue to strengthen our digital resilience each year.

Accredited to the ISO 27001 standard for over a decade, we operate a robust Information Security Management System supported by our Security Operations Centre. Our approach combines advanced monitoring, phishing awareness training with simulated attacks, and comprehensive business continuity, incident response, and disaster recovery plans. In 2025, we remain committed to protecting our data, systems, and stakeholders through continual improvement and a proactive security culture.



Data protection

We apply multiple layers of protection to safeguard our information assets, guided by our ISO 27001:2022 certified Information Security Management System (ISMS).

Every team member receives regular training on information security and participates in phishing awareness exercises to maintain vigilance against evolving cyber threats. Our technical defences include up-to-date devices, Endpoint Detection and Response (EDR), continuous vulnerability scanning, and 24/7 monitoring through our Security Operations Centre (SOC).

We routinely review and test our Business Continuity, Disaster Recovery, and Cyber Incident Response plans to ensure readiness. In addition, we rigorously vet, monitor, and audit our suppliers in line with our Supplier Management policies, ensuring security and resilience across our entire value chain.



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Sustainability remains at the heart of everything we do. Over the past year, we have continued to advance safe, eco conscious infrastructure, strengthen our diverse and inclusive culture, and invest in the communities and environments that support us. Our commitment to sustainability is not only a response to the evolving challenges of our time but also a long-term promise to build resilient, adaptable networks that will endure for generations.

In the year ahead, we are deepening our focus on transparency and measurable progress. Enhanced emissions tracking, clear reduction targets, and robust risk management frameworks will guide our journey as we hold ourselves accountable to high standards.

Every initiative we champion from expanding electric vehicle infrastructure to empowering our people through development and inclusion reflects our core values and our vision for responsible, forward-thinking growth. Together with our partners and stakeholders, we are building a sustainable, inclusive future that leaves a lasting positive impact.





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APPENDIX 1 | GENDER RATIO 2024

Year	Gender	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2025	Female	48	49	49	51	50	50	51	53	53	53	52	52
	Gender neutral	0	0	0	0	0	0	0	0	0	0	0	0
	Male	69	70	71	68	68	70	76	77	83	84	83	81
	Non-binary	0	0	0	0	0	0	0	0	0	0	0	0
	Not set	31	30	30	30	30	30	28	27	26	26	26	26
	Transgender	0	0	0	0	0	0	0	0	0	0	0	0

APPENDIX 2 | GHG EMISSIONS REPORTING

Our primary emissions are from the energy lost as electricity travels through our wires

Table 1: Inventory summary

Category (ISO 14064-1:2018)	Scopes ^(iso)	2022	2023	2024
Category 1: Direct emissions (tCO ₂ e)	Scope 1	47.42	33.24	47.39
Category 2: Indirect emissions from imported energy (location-based method*) (tCO ₂ e)	Scope 2	7,524.25	9,738.96	12,119.41
Category 3: Indirect emissions from transportation (tCO ₂ e)	Scope 3	27.93	25.34	11.12
Category 4: Indirect emissions from products used by organisation (tCO ₂ e)		1.37	1.29	1.36
Category 5: Indirect emissions associated with the use of products from the organisation (tCO ₂ e)		0.00	0.00	0.00
Category 6: Indirect emissions from other sources (tCO ₂ e)		0.00	0.00	0.00
Total direct emissions (tCO ₂ e)	-	47.42	33.24	47.39
Total indirect emissions* (tCO ₂ e)	-	7,553.54	9,765.60	12,131.90
Total gross emissions* (tCO ₂ e)	-	7,600.96	9,798.83	12,179.29
Category 1 direct removals (tCO ₂ e)	-	0.00	0.00	0.00
Total net emissions (tCO ₂ e)	-	7,600.96	9,798.83	12,179.29



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Table 2: Emissions inventory summary for this measurement period

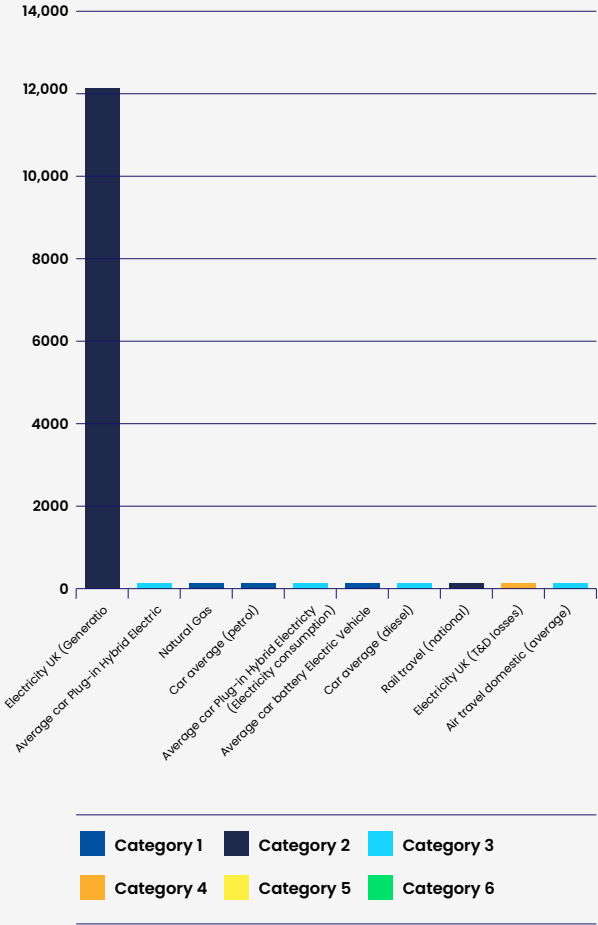
Measurement period: 01 January 2024 to 31 December 2024

Category	Toitū carbon mandatory boundary (tCO2e)	Additional emissions (tCO2e)	Total emissions (tCO2e)
Category 1: Direct emissions	47.39 Average car Plug-in Hybrid Electric Vehicle, Car Average (diesel), Natural Gas	0.00	47.39
Category 2: Indirect emissions from imported energy (location-based method*)	12,119.41 Average car Battery Electric Vehicle, Average car Plug-in Hybrid Electric Vehicle (Electricity consumption), Electricity UK (Generation) (2013 Methodology)	0.00	12,119.41
Category 3: Indirect emissions from transportation	11.12 Air travel domestic (average), Air travel short haul (econ), Car Average (petrol), Rail travel (national), Taxi (regular)	0.00	11.12
Category 4: Indirect emissions from products used by organisation	1.36 Electricity UK (T&D losses) (2013 Methodology)	0.00	1.36
Category 5: Indirect emissions associated with the use of products from the organisation	0.00	0.00	0.0
Category 6: Indirect emissions from other sources	0.00	0.00	0.0
Total direct emissions	47.39	0.00	47.39
Total indirect emissions*	12,131.90	0.00	12,131.90
Total gross emissions*	12,179.29	0.00	12,179.29
Category 1 direct removals	0.00	0.00	0.0
Total net emissions	12,179.29	0.00	12,179.29

Emissions intensity	Mandatory emissions	Total emissions
Operating revenue (gross tCO2e / £Millions)	76.50	76.50

*We use a location-based methodology to report emissions.

TOP 10 EMISSIONS (TCO₂E) BY SOURCE



Scope of measured inventory



INTRODUCTION

CEO'S FOREWORD

OUR SUSTAINABILITY STRATEGY

Our sustainability vision
Our sustainability pillars
Sustainable
Diverse
Responsible

EMISSIONS MEASUREMENT, REPORTING & REDUCTION

Consolidation approach
Reduction targets

STAKEHOLDER ENGAGEMENT

CHARITY ENGAGEMENT

STAFF ENGAGEMENT

Empowering growth
Wellbeing, support & social value
Celebrating diversity & inclusion
Step up programme
Apprenticeship programme

CUSTOMER SERVICE

Think Customer
Customer commitment
Our customer promises
Standards of performance

GOVERNANCE

CONCLUSION

APPENDIX



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