


Sustainability Report 2024

An aerial photograph of a large wind farm in a rolling green landscape. Numerous white wind turbines are scattered across the hills. In the background, a bright sun is setting or rising, creating a warm, golden glow over the entire scene. A dirt road winds through the foreground, and a small white vehicle is visible at a junction.

In our first year as **OnPathEnergy**
we're laying the foundations
for a fairer, cleaner, more hopeful
future, not just for today,
but for every tomorrow.



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CEO message: Together to a greener future

2024 represents the first full calendar year of our rebranding as OnPath Energy and our integration into one of the largest renewable energy platforms globally, operated by Brookfield Asset Management.

I am therefore proud to present this first sustainability report as OnPath Energy, marking a significant milestone in our journey as a leading UK renewable energy developer.

With this report, we are setting the foundation for our new sustainability commitments, underpinned by our ambitious plans for driving the UK's transition to more affordable, secure, clean sources of energy. And our plans are certainly ambitious: we aim to invest around £1 billion in building renewables infrastructure

in the UK over the next five years, helping drive the UK's transition to net zero while creating and supporting hundreds of skilled, sustainable, green jobs.

Communities sit at the heart of our plans: through our award-winning community-led approach, our projects deliver millions of pounds in community benefit funds to ensure that local people benefit economically, environmentally and socially from the projects. We believe this is what truly sets us apart from other renewables developers – our ethos of 'OnPath Together' to support a fair, inclusive and just transition that leaves no one behind.

Alongside communities, nature takes a front-row seat in our designs. We draw on almost 50 years of experience in planning for and managing habitats that enable nature to thrive, and we tackle biodiversity loss with the same conviction and determination as

climate change. We work with local experts to create tailored habitat management plans for each site. In 2024, we restored or maintained more than 990,000 m² of land or freshwater ecosystems through our projects.

To drive our ambitious plans, we rely on our dedicated team which has doubled in size over the last two years. We moved our headquarters to a larger, more modern, energy efficient building, commissioning a local design firm to incorporate environmentally conscious aspects reflecting our values. Our inclusive and supportive work culture remains strong, and we are currently implementing a new learning management system to centralise the training that enables our people to thrive in their roles. We are equally committed to helping the next generation accelerate their careers and will launch new graduate and apprenticeship training programmes in the coming years.

I am truly excited for the future and the ambitious plans we have for generating and storing more clean energy to power thousands more UK households and businesses.

We stand steadfast in our mission. We aim to deliver more efficient and innovative renewables projects that will help to lower consumer energy bills, improve the UK's energy security and support the delivery of a just transition that is fair and inclusive for everyone.



Richard Dunkley, CEO, OnPath Energy



990k

In 2024, we restored or maintained more than 990,000 m² of land or freshwater ecosystems through our projects

Sustainability highlights 2024

Climate and nature positive

- Spearheaded more than **21** wind, solar, and energy storage projects across England and Scotland.
- Our **12** operational wind farms:
 - generated **653,275 MWh** of clean, renewable energy
 - enough to power over **240,000** homes
 - avoided **198,825 tCO₂e** emissions from standard grid electricity
- Officially opened the Kype Muir Extension wind farm which will deliver **67.2 MW** of generation capacity, enough to power **53,700** homes annually.
- Acquired **two** additional operational wind farms.
- We are climate positive, avoiding over 500 times more carbon emissions from the grid than we generated across our scope 1 & 2 sources.
- All operational wind farms had a **meaningful impact** on priority biodiversity based on our Environmental Impact Assessments.
- Continued progress with plans for Barnsdale & Common Farm Solar Energy Parks, which will deliver **106%** and **69%** biodiversity net gain when built..

Developing together

- Gender diversity employees: **58% male, 42% female.**
- Employee NPS score (for employee satisfaction) increased from 30 in March 2024 to **68** in November 2024 following a range of initiatives.
- Initiated the roll-out of a **new learning management system** to host our learning resources.
- Introduced a healthy and sustainable living programme to **engage and inspire** our employees to make practical lifestyle changes.

A just transition

- Delivered over **£2.1 million** in community funds from our renewables projects, supporting over **100 community groups** and environmental projects in Northern England and Scotland.
- Almost **£600,000** went to local projects focused on climate action and sustainability.
- Shortlisted for the In-House Planning Team of the Year category of the **2024 Royal Town Planning Institute (RTPI) Awards for Planning Excellence**, for the positive contributions made to the local communities.
- Shortlisted for the **Best Engagement Award** at the Scottish Green Energy Awards for our community outreach during the building of the Kype Muir Extension wind farm.

Responsible business

- Risk screened 280 of our suppliers across categories like anti-bribery & corruption and ESG.
- Introduced a confidential **ethics hotline** for employees.
- Embedded a **'Cybersecurity First'** approach in the migration of all data and systems to OnPath Energy, including a suite of cybersecurity tools and third-party monitoring and alert software.
- Achieved **zero** reportable breaches on Personal Identification Information (PII).

Future ambitions

- Invest **£1 billion** in UK renewables infrastructure over the next five years.
- Bring forward around **3 GW** of renewable energy capacity from the projects in our development pipeline.
- Create **hundreds** of skilled, sustainable green jobs across the UK.

Delivered over
£2.1 million
in community funds

wow

Generated **653,275 MWh** of clean, renewable energy



**Invest
£1 billion**

in UK renewables infrastructure
over the next five years

Who we are...

OnPath Energy is a leading UK land-based renewable energy developer, providing green energy solutions for thousands of UK households, businesses and communities. Our vision is to power a more sustainable future through renewable energy. Formerly Banks Renewables, we've been committed to powering a greener future since 2006.

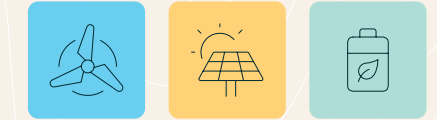
What we do...

We help to deliver 100% renewable energy for the UK through our growing portfolio of onshore wind, solar and energy storage projects. We address the whole picture of the land-based energy transition, including green energy generation, grid flexibility, storage and heat. Our team delivers inclusive net-zero projects, combining large-scale renewables with master planning developments that place local communities and nature at the very heart of what we do.





Harnessing wind energy



Onshore wind is one of the fastest growing and cheapest forms of energy sources in the world. It is also an essential part of the UK's strategy for achieving country-wide net zero targets. OnPath owns and operates 12 onshore wind farms across northern England and Scotland with 252 MW of renewable electricity generation capacity.

Our plans for growth are substantial: We have planning permission for up to 568 MW of renewable electricity

generation and flexible energy storage projects, with a further 3GW in our full development pipeline. Combining our operational and already-consented pipeline, our projects could provide enough energy for around 700,000 homes, which is roughly twice as many as the city of Leeds.

Capturing solar energy

Solar energy will also play a key role in achieving net-zero emissions. We have obtained planning permission for a solar farm near Leeds and a co-located solar farm and battery energy storage site in Rotherham. Construction for both sites will start in summer 2025, and when operational, they will have the capacity to generate 89MW electricity, enough to power 30,000 homes.

Storing renewable energy

As the country is increasingly powered by renewable energy sources, we need large scale, flexible energy storage to maintain a steady stream of electricity whatever the weather. By developing battery energy storage systems (BESS) rather than burning fossil fuels to meet short term demand we avoid significant CO₂ emissions, helping to make the energy grid more efficient and facilitate more renewable energy generation. This also helps to improve the UK's energy security, and provides more stable prices for consumers.

OnPath has three battery storage facilities in development with a combined potential energy storage of up to 1,900 MWh of energy. This is enough to power the peak demands of more than 1.1 million homes for two hours.

Our values and how we work

We place people, communities and planet at the heart of everything we do. We believe that better projects come through listening, collaborating and delivering with care and consideration. Our approach is firmly rooted in sustainability principles and comprises three core elements:

1

Working to support a just transition to net zero that is fair and inclusive for all.

As a values-based business, we make long-term commitments to help the communities living locally to our projects benefit socially, economically and environmentally from their presence.

We go above and beyond to engage: our consultations are wide and inclusive, giving everyone the opportunity to have their say and

help shape the direction of renewable energy projects near them.

We prioritise local businesses in our supply chain, and we channel revenue from our projects into community investment funds as well as offering shared ownership to ensure local people benefit from the projects.





2

Developing market-leading, innovative, large-scale renewables projects.

We are problem solvers – innovating new ways to deliver affordable renewables projects which help tackle climate change, help to drive down energy bills and improve the UK's energy security for the long term.

Our innovation has brought leading renewable technology to market commercially such as

the installation of the UK's tallest and most efficient turbine at Kype Muir Extension in South Lanarkshire.

Our Kype Muir Wind Farm is used by the UK government as a best practice example in guidance for onshore wind.



3

Creating value for the environment and people through long-term partnerships.

We're passionate about the environmental benefits we deliver, ensuring that through our work, we create long-lasting enhancements to habitats, biodiversity and landscapes. We're equally passionate about working in partnership with landowners and local businesses, building long-term relationships based on trust and integrity to help boost local economies.



Our values

OnPathEnergy



Think People & Planet

We place people and planet at the heart of what we do



Listen and care

We listen and care to understand



Creating a better way together

We believe in creating better projects through collaboration



Seeing the big picture

We consider how things are connected



Building community value

We believe in building value together with communities

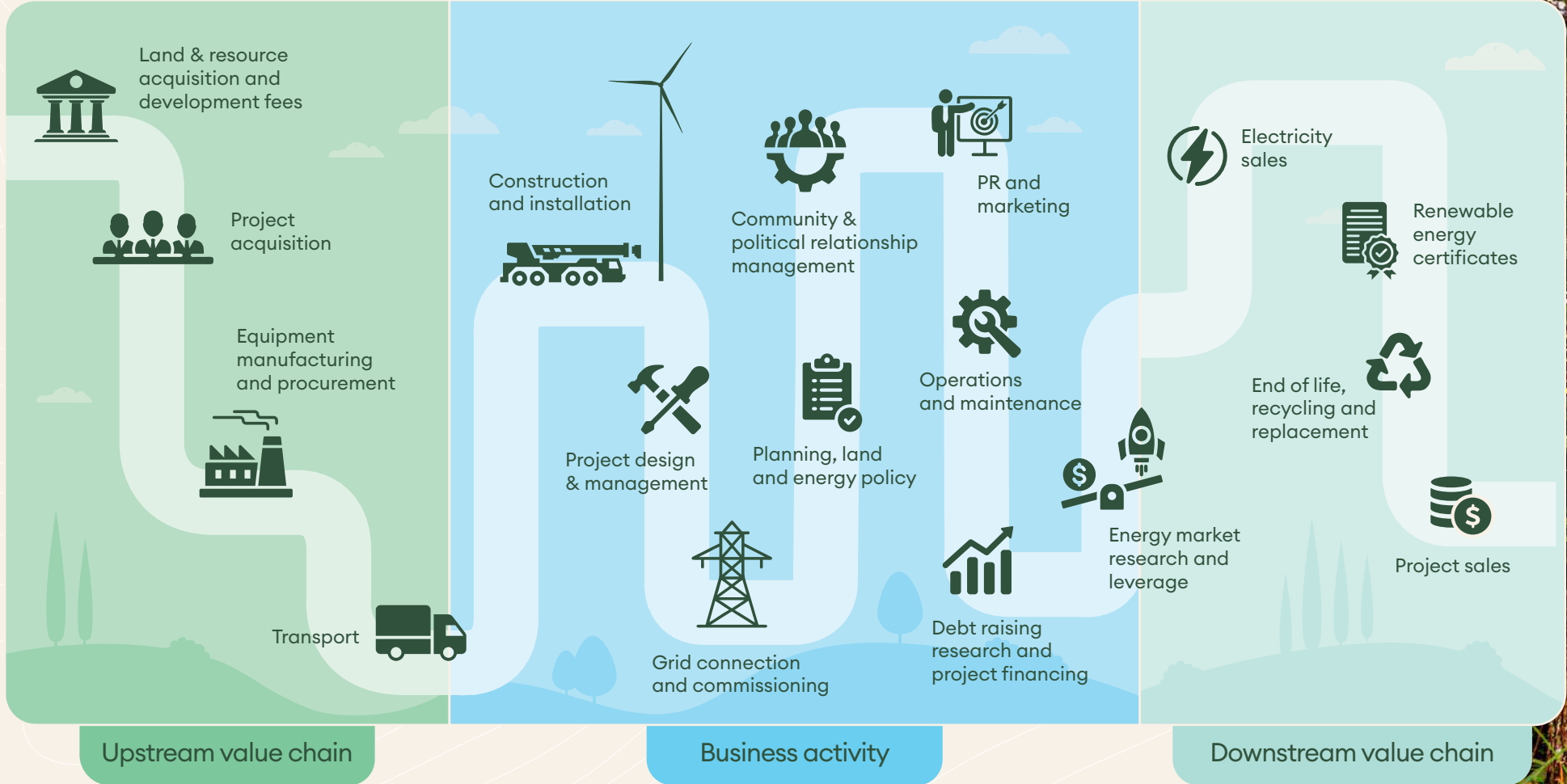


Trust and integrity

We know trust and integrity are hard-earned



Our value chain



Sustainable headquarters

At OnPath, where we work is just as important as how we work. In 2024, we relocated our headquarters to Chase House in Houghton-le-Spring, Sunderland.

The move to the 13,200 sq ft premises reflects our ambitions for growth, having created more than 30 skilled jobs in the local area over the last year. The modern, open plan location was chosen largely based on its sustainability credentials, boasting an Energy Performance Certificate (EPC) A energy rating which includes eco-friendly, heat pump air conditioning.

We worked with a local company for the fit out, incorporating an environmentally-conscious design through a range of natural materials, including wood, stone and a moss wall.

Functionality and flexibility were integral to the design, to create a work environment in which our team can thrive. Beyond our headquarters, we continue to maintain an office in Hamilton, South Lanarkshire, close to our flagship wind farms.





Accelerating our growth with a world class partnership

In 2023, OnPath Energy (known as Banks Renewables at the time) was acquired by the Brookfield Global Transition Fund Series 2 (BGTF II), which is managed by Brookfield Renewable. Brookfield Renewable is the flagship renewable power and transition business of Brookfield Asset Management, and one of the world's largest investors, developers, owners, and operators of renewable power and sustainable solutions assets. BEP has one of the largest renewable energy platforms globally, with 46GW of generating capacity and a pipeline of over 200GW.

By leveraging the expertise, access to capital, and corporate partnerships that Brookfield Renewable offers, including its unique power supply agreement with Microsoft, OnPath Energy can accelerate its growth in the UK and deliver faster on our promise to expedite the UK's green energy transition in a fair and inclusive way that doesn't leave communities behind.

OnPath Energy is led by the same team as under Banks Renewables, building on our trusted position and extensive expertise in the UK's onshore renewable energy market.

About this report

This is our first sustainability report as OnPath Energy, covering the period 1 January – 31 December 2024.

We are voluntarily reporting our environmental, social and governance (ESG) information, using the European Sustainability Reporting Standards (ESRS) to guide our double materiality assessment and determine our material topics – see the next section for more details on the process and outcomes.

Reporting with guidance from the ESRS positions OnPath at the forefront of sustainability best practices, reinforcing our reputation as a responsible business. By adopting practices from this rigorous framework, we not only align with evolving global expectations but also demonstrate our commitment to transparency and accountability, providing our stakeholders – including investors, customers, and regulators – with reliable, comparable, and comprehensive ESG data. This helps us to build trust and validate our sustainability strategy through robust stakeholder engagement and feedback mechanisms, ensuring our actions reflect the priorities and concerns of those most impacted by our operations.

Embracing sustainability reporting also helps to future-proof our business strategy as we embed long-term resilience and adaptability into our core decision-making processes. Through systematic identification, evaluation, and mitigation of ESG risks, we strengthen our risk management capabilities, safeguarding OnPath

against emerging environmental, social, and regulatory challenges.

This proactive approach not only reduces vulnerabilities but also unlocks new business opportunities through stronger ESG performance,, drives innovation, and supports sustainable growth.

Ultimately, voluntary alignment with the ESRS will enable us to create enduring value for shareholders and society, ensuring OnPath remains competitive and relevant in the rapidly changing renewable energy space.

The data in this report covers the year 2024; however, where relevant, we also include historical content from our time as Banks Renewables, and forward-looking aspirations and projections. As 2024 was the first full calendar year of operations as OnPath Energy, the data and information we publish here will serve as a baseline for our future goals and targets.



Our sustainability approach and ESG commitments

Determining our material topics

We partnered with leading consultants Anthesis Limited to conduct a double materiality assessment. This allowed us to determine the sustainability topics that are most significant to OnPath and its stakeholders.

This process enabled us to identify and prioritise the environmental and social topics on which OnPath’s activities have the greatest impact, and to identify how sustainability-related risks and opportunities could affect OnPath’s financial performance and long-term value.

Through a range of peer benchmarking, and internal and external stakeholder engagement – which included key business partners, community councils, primary contractors and political stakeholders – we developed a list of potentially material topics, using the ESRS for guidance. This broad range of stakeholder insights was crucial for making our DMA as objective and balanced as possible.



For each topic we identified relevant impacts, risks and opportunities, based on the following:

-  **Time horizon (short, medium or long-term)**
-  **Actual or potential**
-  **Positive or negative**
-  **Value chain location**
-  **Affected stakeholder**
-  **Human rights impact**
-  **Source of the impact, risk or opportunity**

We then prioritised the topics based on their likelihood of occurring and severity. The yellow section of the materiality matrix contains our material topics, categorised into 1) priority issues – those on which we will report and for which targets have been set; and 2) strategic response topics – those which are highly significant, but do not necessarily have targets assigned to them. This distinction was made due to the priority issues having approximately double the number of identified impacts, risks and opportunities, therefore warranting an increased focus. The topics in the blue section were deemed as non-material for OnPath Energy at this point in time and as such, we do not report on these.

In total, we identified 122 impacts, risks and opportunities (IROs). We then assessed each one based on their scale, scope, irremediability and likelihood of occurring (for the impacts) and financial, activity, reputational and legal implications and likelihood (for the risks and opportunities). Those scoring above a specific threshold were deemed our material IROs, in total 50, of which: 14 represented negative impacts, 12 positive impacts, 11 financial risks, and 13

opportunities. For the full list of IROs identified for each material topic and their descriptions, please see Appendix I.

We categorised our IROs under the following topics defined by the ESRS:

Climate change
These IROs relate to our work in decarbonising the energy grids through our renewables projects and to further support carbon sequestration through dedicated land management at our sites.

Biodiversity and ecosystems
These IROs relate to our commitment to developing habitats that boost biodiversity at our sites.

Circular economy
These IRO's reflect our approach to responsible sourcing and incorporating circular practices into our operations and waste management and extending the lifespans of our projects where feasible.

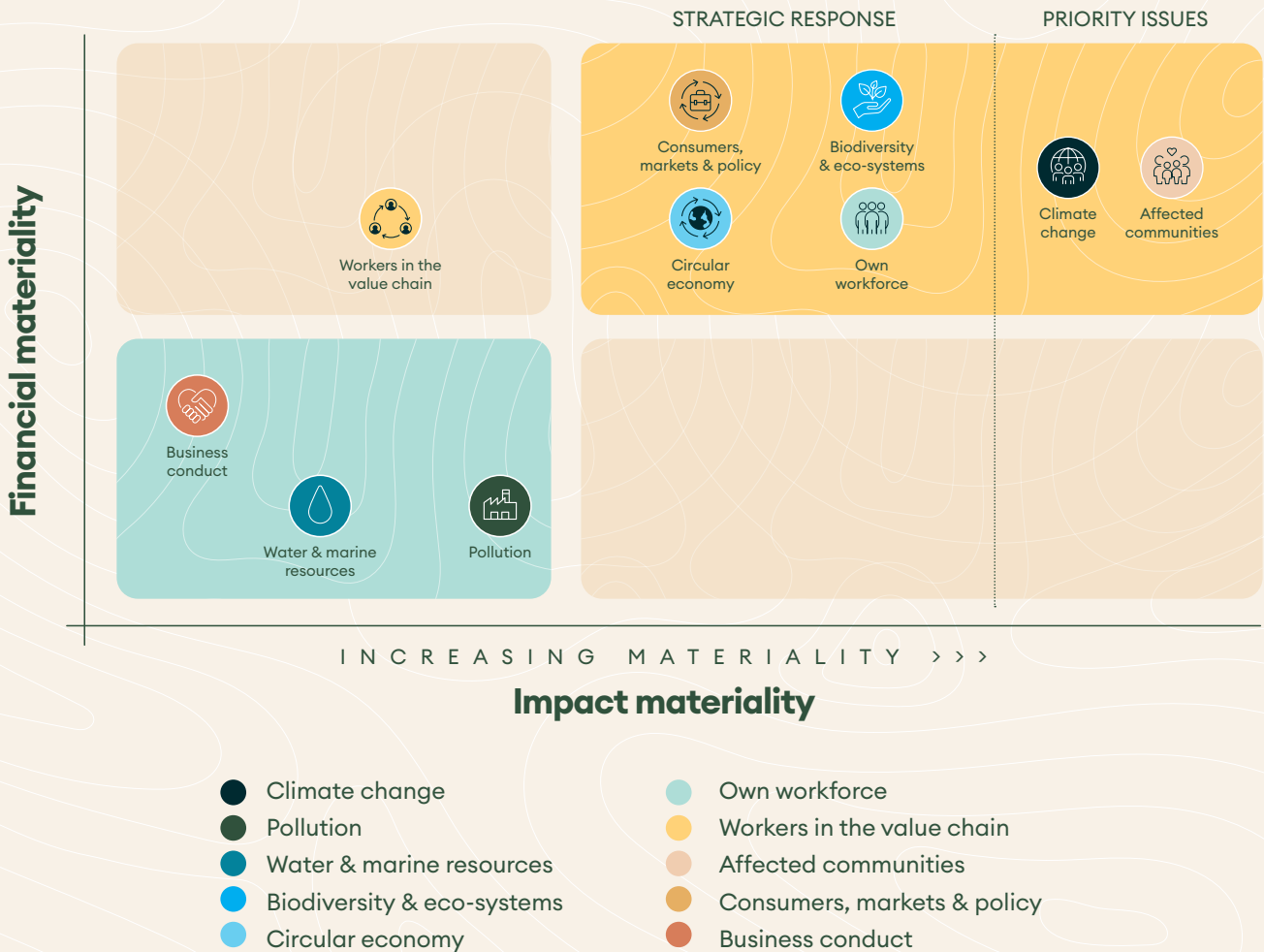
Own workforce
These IROs reflect our priorities for protecting the safety and wellbeing of our people and enabling their professional growth and development.

Affected communities
These IROs cover the spectrum of environmental, social and economic impacts our projects have on local communities.

Consumers, markets and policy
These IROs relate to our work to increase national energy security, drive down energy prices and support policy that enables further decarbonisation.

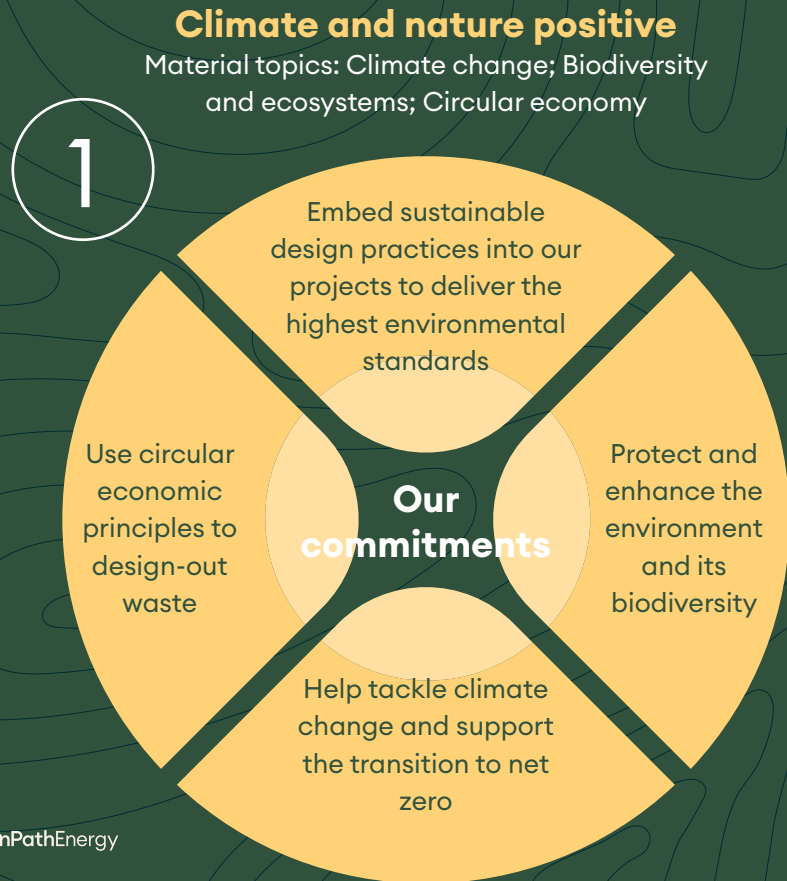
The results of the DMA have shaped the development of our new ESG commitments – a set of goals and targets that guide us in delivering the greatest positive impact for the environment, our people and society while managing any negative impacts and mitigating potential risks to the business.

Double materiality assessment



Our ESG commitments

To fully incorporate the results of the DMA into our OnPath Together strategy, we aligned the six identified material topics under the following four pillars:



Governance of our sustainability approach and commitments

Our statutory shareholder board has ultimate oversight of sustainability at OnPath Energy, receiving regular updates via the management board and Director of Sustainability & Communities. Oversight at this highest level ensures that sustainability remains a core focus for OnPath and is incorporated into strategic decision-making processes.

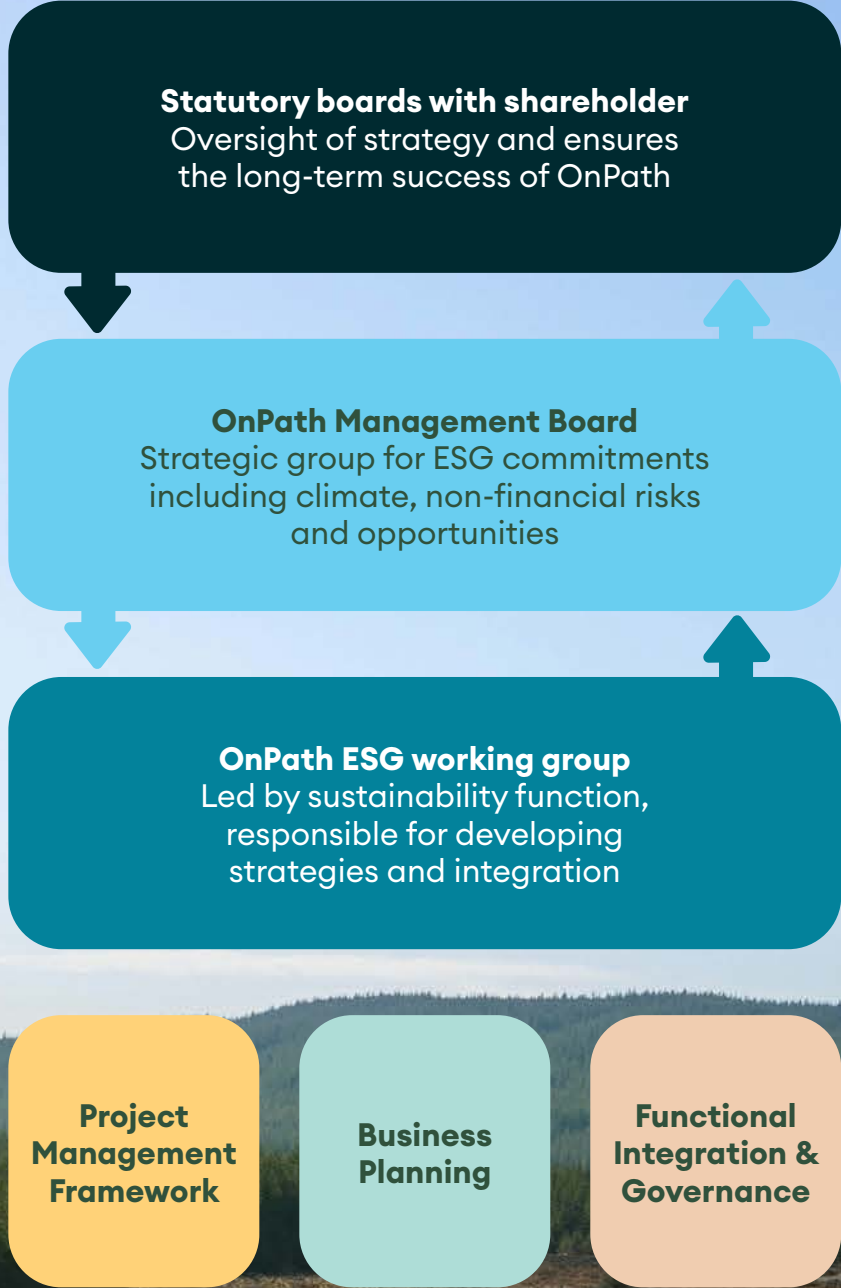
Our Director of Sustainability and Communities has overall responsibility for sustainability at OnPath and for ensuring our sustainability commitments are embedded in our strategies.

On an operational level, the ESG working group is responsible for ensuring the OnPath Together commitments are integrated into project plans, while relevant departments take ownership for specific areas, for example the HR department is responsible for our people-related commitments.

Project managers and teams play a crucial role in actioning our commitments and monitoring and reporting on progress.

Ultimately, we all take responsibility at OnPath Energy for maintaining responsible business practices.

These are values embedded in our company ethos and enshrined in our vision for powering a more sustainable future supported by a fair, just and inclusive transition to renewable energy.



Climate and nature positive

We take a nature-positive approach to all we do. Through our wind farms, solar energy parks and large-scale battery storage, we create solutions that help tackle climate change and improve local habitats at the same time. We continuously innovate and build sustainable design principles into our plans from the outset, and we are increasingly adopting circular economy solutions to manage our waste.



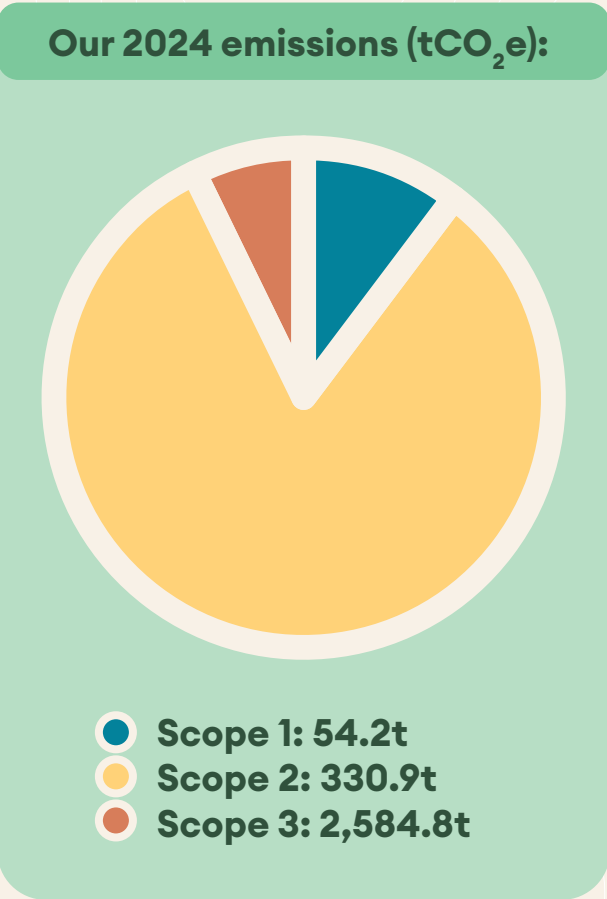
We aim to be a force for good, reflected in our four climate and nature commitments...

Our commitments:

- Help tackle climate change and support the transition to net zero
- Use circular economic principles to design out waste
- Protect and enhance the environment and its biodiversity
- Embed sustainable design practices into our projects to deliver the highest environmental standards

Our 2024 climate and nature highlights:

- Displaced over 198,000 tCO₂e, the equivalent of avoiding the emissions from 95,000 cars
- Added 28 MW generating capacity to our portfolio
- 990,450m² of habitat restored or maintained on our sites
- Aligned with the Coalition for Wind Industry Circularity (CWIC)
- Completed our ESOS audit and developed an action plan for energy reductions to 2027



Helping the UK tackle climate change and support the transition to net zero

Our material impacts, risks and opportunities

● Positive	Renewable energy projects reduce CO ₂ emissions and mitigate climate change.	Green energy initiatives drive national grid upgrades, boosting efficiency and renewable capacity, helping to accelerate net-zero.	
● Negative	GHG emissions from our operations and supply chain, particularly the high embodied emissions in our upstream value chain, such as major components.	Lack of supply chain transparency across Scope 3 risks underestimating our environmental impact, reducing the ability to mitigate climate change.	Inefficient grid connections causing energy losses and reduced revenue.
● Opportunities	Rising demand for net-zero and renewable projects strengthens the business and increases clean energy production.	Utilising Renewable Energy Certificates and carbon credits incentivises investment in renewables projects and reduces GHGs.	
● Risks	Inefficient and insufficient grid upgrades leading to a lack of grid connection and transmission capacity, resulting in project delays and lost revenue.	Risk that climate action strategy is not updated, leading to increased business risk stemming from the impacts of climate change.	

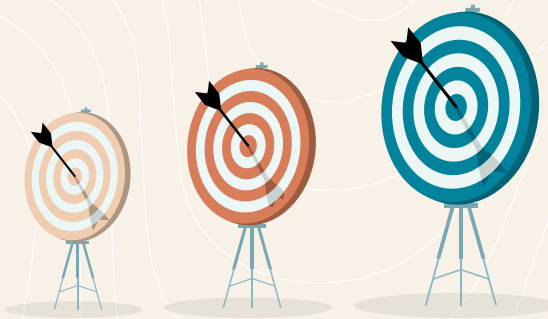


Our targets:

Achieve net zero for Scope 1 and 2 by 2030

Achieve net zero for Scope 3 by 2050

Double our delivered generation & storage capacity by 2030



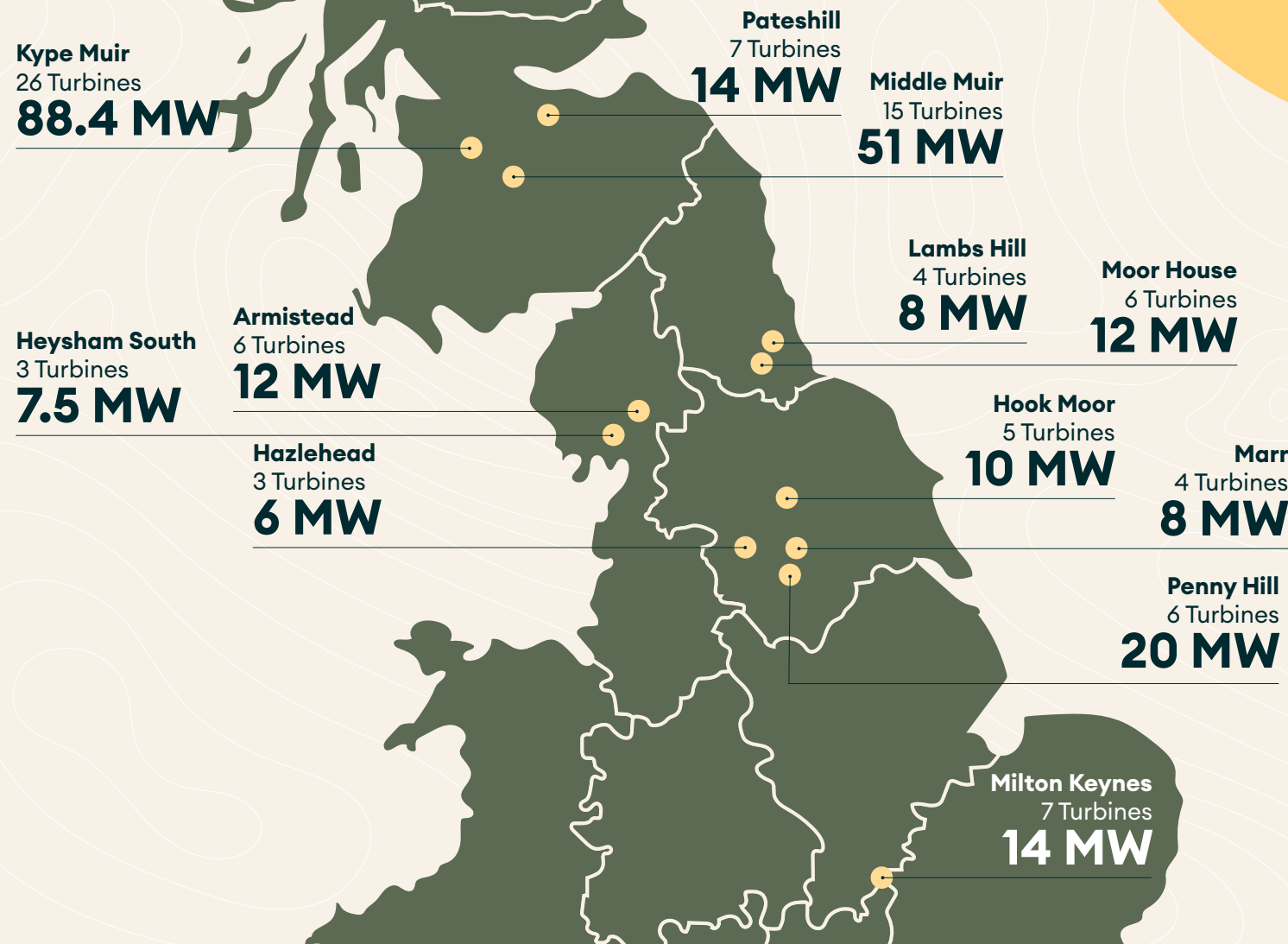
The transition to net zero carbon emissions is essential for the future of our planet, to curb the most severe effects of climate change.

Harnessing wind and solar energy form a key part of the UK’s transition plan, and OnPath is helping make this a reality by developing affordable, renewable and flexible electricity generation and storage solutions to expedite the transition to green energy.

Our expertise in designing and maintaining wind farms spans almost 20 years. We design our projects for optimum energy efficiency, to support greenhouse gas reduction, and to build greater climate resilience.

Through our 12 operational wind farms, we generated 653,275 MWh of clean, renewable energy, powering 240,000 homes in 2024. This capacity could rise to 3 GW when we action our full pipeline of wind, solar and battery energy storage systems (BESS), of which we have planning permission for up to 568 MW of renewable electricity generation and flexible energy storage projects, and a further 217 MW currently in the planning system.

The renewable energy we supplied to the grid in 2024 displaced 198,825 tCO₂e – the emissions that would have been generated from the national grid mix which includes coal, natural gas or nuclear power. That’s the equivalent of taking approximately 95,000 cars off the road.



3 million

Since opening our first wind farm in 2011, we have generated more than 3 million MWh of renewable energy for UK homes, businesses and communities.

653,275 MWh of renewable energy...

powering 240,000 homes in 2024

Ambitious plans for growth

We aim to double the capacity of renewable energy we generate by 2030, based on our 2024 capacity. We are already making progress towards this: in 2024 we added two new ROC-accredited operational onshore wind farms to our fleet: the Milton Keynes Wind Farm in Buckinghamshire and the Pates Hill Wind Farm in West Lothian. Both wind farms have been operational since 2010 and comprise seven 2.0 MW turbines with a combined installed capacity of 28 MW, which is enough to meet the annual electricity needs of around 23,000 homes.

“The Milton Keynes and Pates Hill Wind Farms represented a strong fit with our development framework and their acquisition provides a positive outcome for all concerned, including the local communities that will continue to benefit directly from the revenues that these wind farms generate.”

Richard Dunkley, CEO, OnPath Energy

In 2025, work is due to commence on a new wind farm – Mill Rig Wind Farm in South Lanarkshire; a new solar farm – Barnsdale Solar Farm near Leeds; and a co-located solar and battery scheme at Common Farm in South Yorkshire.



Managing our own emissions

While the biggest positive impact we can make is on the emissions that we help the UK avoid through our renewable energy generation, we are also working hard to reduce our own emissions – those we generate through our operations (Scope 1 and 2) and our supply chain (Scope 3). Our target is to reach net zero for our Scope 1 and 2 emissions by 2030, and by 2050 for Scope 3.

In 2024, we generated a total of 2,969.9 tCO₂e emissions using market based calculations which take specific energy contracts into account.

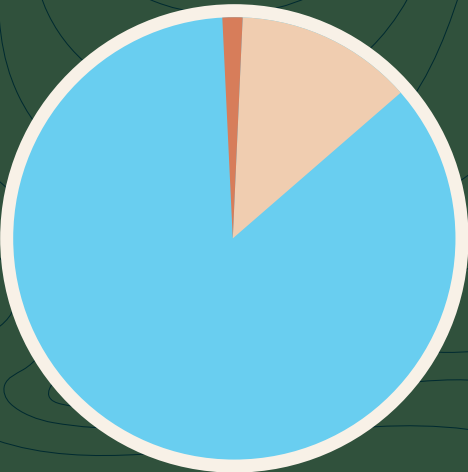
We are currently identifying our decarbonisation levers and will be exploring how we further reduce our emissions over the next 12 months.

To calculate our Scope 3 emissions, we currently include the following which are deemed to be most material to our business:

- Emissions from company air-travel
- Emissions generated by third-party engineering and construction services (EPC)
- Emissions generated by operations and maintenance companies (O&M companies) travelling to our sites
- Embedded carbon in the major components of our projects (turbines, blades, motors etc.)
- Our scope 3 emissions were lower in 2024 because no projects fully completed in this period, but following years will likely see this figure rise

Category	tCO ₂ e
Scope 1	54.2
Scope 2	330.9
Scope 3	2,584.8
Total	2,969.9

Using market based calculations



Our approximate Scope 1 & 2 emisisions breakdown

- Electricity consumption
- Stationary combustion
- Owned/controlled vehicles

Nature-based solutions to tackle climate change

It's not only by reducing emissions and that we are helping to tackle climate change. Through careful design and planning, we can harness the power of nature to help us remove CO₂ from the atmosphere.

Our projects often cover relatively large areas of land, however the actual renewables infrastructure on them takes up a very small percentage – particularly for onshore wind farms. This provides a significant opportunity for additional land use to maximise the environmental benefits. One of the biggest opportunities is for carbon sequestration – capturing and absorbing carbon dioxide from the atmosphere through natural processes. This is especially true for the peat bogs that

surround our wind farms. Peat bogs act as natural carbon sinks with the ability to store twice as much carbon as all the world's forests combined. Through careful design of habitat management plans, we've restored hundreds of acres of peat bogs around our wind farms.

In 2024, we partnered with a local construction firm, Drumclog Plant Ltd. – known for leading habitat restoration in Scotland – to revitalise 91 hectares of vital peat bog surrounding the Middle Muir Wind Farm. This restoration ensures that the peatlands will continue to capture and store carbon effectively and support local biodiversity for decades to come. The project involved diverse bog restoration techniques such as peat hag reprofiling (reshaping and covering exposed peat edges to prevent further erosion) and installing peat dams to elevate water levels and maintain wet conditions which are essential for peatland health.

Over
91
hectares
of peat bog
protected

As well as being a highly effective carbon sink, healthy peatland provides an important habitat for many species including butterflies and owls, as well as the endangered Black Grouse. Peatland also functions as a natural water filter and flood deterrent.

“Preserving and enhancing peatlands like this is crucial for the country's biodiversity. Peatlands are phenomenal natural carbon sinks, locking in vast amounts of carbon, that is why we must do everything in our power to secure their future.”

Rachael Edmunds,
Senior Development Planner,
OnPath Energy



Over the coming years,

through a series of assessments, we plan to better understand how much carbon our projects are sequestering, to gain a more accurate and complete picture of our broader positive impacts associated with carbon.

Managing climate risk at OnPath

We have recently conducted a comprehensive climate risk assessment to understand how our existing assets, pipeline of future projects and our business model may be affected by climate change under different warming scenarios.

This process helps us identify the risks and opportunities posed by a changing climate to our day to day operations and to our long term success as a business. It is essential for developing effective strategies for managing climate risk and for ensuring the viability and sustainability of new projects. We align our approach with the Task Force on Climate-related Financial Disclosures (TCFD) which provides recommendations to companies reporting on climate related risks and opportunities.

As part of the assessment, we look at physical risks early on the development phase, for example the effect that extreme weather events and temperature increases could have on our projects. All of our assets underwent a physical climate risk screening in 2024, utilising historical data and events to model future climate scenarios. This assessment will continue to be updated periodically, with new assets being assessed upon acquisition.

As part of this process we also consider transitional climate risks and opportunities, driven, for example, by shifts in policies and regulations, market pressures and supply chain volatility. As we mature in our approach, we aim to further integrate the full climate risk and opportunity assessment into our core processes for effective ongoing management and long-term resilience across the range of climate scenarios and pathways, including our company wide risk-register.

Our physical climate risk summary

	Temperature-related	Wind-related	Water-related	Solid mass-related
Chronic	Changing air temperature	Changing wind patterns	Changing precipitation patterns	Soil erosion
			Water stress	
			Sea level rise	
Acute	Extreme heat	Tropical cyclone	Drought	Landslide
	Extreme cold	Storm	Extreme precipitation	Earthquake
	Wildfire		Flood	Subsidence

Identifying future energy reductions from our own operations

As part of the UK government’s Energy Savings Opportunity Scheme (ESOS), we undertook a comprehensive audit in 2024 of all sources of OnPath Energy’s emissions under our operational control. This comprised our office facilities in Scotland, our

Kype Muir Wind Farm (classed as an operational asset), together with our other office spaces and the vehicles under company control. The audit’s recommendations for further reducing our energy use have been incorporated into an action plan for 2025, and include the following measures:

- Making temperature control adjustments and installing temperature alarms in our wind farm control rooms, with the potential of saving 156,980 KWh annually, equivalent to 32 tCO2e.
- Completing the transition from diesel company vehicles to electric vehicles (EVs). This has the potential to reduce energy consumption by 141,923 KWh annually. By the start of 2025 we had largely transitioned to a mostly electric fleet.
- Moving our office headquarters into more energy-efficient premises. This is expected to save 112,346 KWh annually.

Protecting and enhancing the environment and its biodiversity



Our material impacts, risks and opportunities

● Positive	<ul style="list-style-type: none">• Implementation of natural flood management techniques enhances water resource protection and reduces flood risk.• Achieving over 10% biodiversity net gain in projects benefits local ecosystems while supporting clean energy generation.
● Negative	<ul style="list-style-type: none">• Risk of peatland damage from developments, reducing carbon sequestration and causing environmental degradation.• Potential disruption of ecosystems and biodiversity loss due to land use changes and habitat creation efforts.• Inadequate biodiversity management may lead to unsustainable development and increased harm to wildlife and habitats.
● Opportunities	<ul style="list-style-type: none">• Enhancing biodiversity through our projects can lead to regulatory over-compliance, improved sustainability, and stronger planning applications, strengthening the business.

Our targets / tracked metrics:

- **Achieve a biodiversity net gain of at least 10% for all new projects.**
- **Track biodiversity and habitat data across all projects.**

Biodiversity is in decline globally, and notably so in the UK, with 16% of over 10,000 assessed species at risk of extinction according to the 2023 State of Nature report. Human activities like deforestation, pollution, overfishing, and climate change are causing species to go extinct at rates much faster than natural background levels. This loss threatens the health of ecosystems that provide us with clean air, fresh water, food, and medicine.

As land developers with near-on 50 years of experience in planning for and managing habitats that enable nature to thrive, we tackle biodiversity loss with the same conviction and determination as

climate change. We have restored more than 990,000 m2 of land (or freshwater) ecosystems through our projects, either managed directly ourselves or through a third-party, in accordance with our planning commitments.

All project plans are thoroughly assessed for their environmental impact – a process known as an Environmental Impact Assessment or EIA, and since 2012, all of our projects have also included a habitat management plan as part of their design. By working with local communities and environmental specialists, we develop effective habitat management plans to ensure they bring the most relevant environmental benefits, entirely bespoke and tailored to each area. We promise to ensure every project delivers a biodiversity net gain of at least 10%, and we monitor and maintain identified habitats throughout the operational life of the projects, tracking their environmental benefits.

Boosting biodiversity at our solar sites

The land occupied by solar farms presents significant opportunities for nature and wildlife to flourish. Planting wildflower meadows underneath and around the solar panels along with increased planting in hedgerows and field boundaries can bring both landscape and wildlife benefits to the sites.

We build these considerations into our plans for new sites, developing tailored habitat management plans for each. The plans for our forthcoming solar parks, Barnsdale Solar Energy Park and the Common Farm Solar Park, are expected to deliver biodiversity net gains of 106% and 69% respectively.

The habitat enhancements will include creating 180ha of species-rich grassland, 6.5ha of wetland grassland, 3.6km of native hedgerows, and planting over 400 native trees. These will deliver significant improvements to the local habitats, offering more variation to support a range of species throughout every season.



Adopting circular economic principles to design out waste

Our material impacts, risks and opportunities

- Negative

 - Raw material extraction and processing for manufacturing (e.g., metals) depletes resources, can cause environmental degradation, and generate hazardous waste, particularly from defective panels, batteries, and turbines.
 - Intensified demand for key minerals (e.g., lithium) risks supply bottlenecks, higher costs, project delays, and challenges in meeting net-zero commitments.
- Opportunities

 - Innovating in recycling and reusing wind turbine blades, solar panels, and batteries reduces waste, supports the circular economy, boosts our cost efficiency and reputation, and improves the strength of our planning applications.

Our targets / tracked metrics:

- Divert 100% of major components (e.g. turbine blades, tower, rotor and hub) from landfill.
- Track waste data from all of our active construction and operational sites.

A circular economy is essential for reducing the strain on natural resources and limiting environmental damage from waste. At its core, it focuses on reusing, repairing, and recycling materials to keep them in use for as long as possible. This approach helps cut down on landfill waste, lowers pollution, and reduces the demand for raw materials, which helps to protect ecosystems and decrease emissions.

Through our operations, we have a significant opportunity to contribute to a circular economy by sourcing, using, reusing

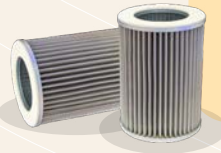
and recycling resources efficiently and responsibly. We design out waste wherever possible to deliver sustainable production and consumption across our business.

We also aim to extend the operational lifetimes of our projects for as long as they remain safe and efficient. This helps us reduce the time, energy and raw materials that are spent on developing new sites to replace them. By keeping the same projects in operation for longer, we avoid generating waste and emissions and improve the overall efficiency of our business. We consult with local communities when submitting planning applications to extend the lifetime of our wind farms and continue community benefits for the extended lifetime of the site. Since no new construction or development is involved, impacts on the community are kept to a minimum.

Operational performance

The majority of our waste is generated at our operational sites, either through servicing the turbines (typically twice per year) or replacing major components, such as gearboxes and motors, or in some cases, turbine blades. A much smaller amount of waste is generated from our offices. Waste from servicing our turbines is largely categorised as ‘hazardous waste’ as it can comprise the following:

- Worn-out components such as filters and bearings
- Electronic components such as sensors, circuit boards or controls.
- Contaminated oily waste which can include oils, fluids, cleaning products and lubricants, oily rags, cartridges and containers



2024 waste:

Total waste:	11,085kg
Non-hazardous waste:	2,845kg
Recycled or reused: <small>(all inorganic waste)</small>	1,742kg
Operational contractor disposal: <small>(handled through O&M contractors)</small>	1,103kg
Hazardous waste:	8,240kg
Recycled or reused:	652kg
Operational contractor disposal: <small>(handled through O&M contractors)</small>	7,588kg

Our operational waste is handled by our O&M contractors as part of our servicing and maintenance contracts with our long-term, trusted partners. As we develop a more circular approach to waste management, we will be working closely with our contractors to gain more granular insights on waste handling, ultimately helping us reduce the use of virgin materials, eliminate landfill and re-introduce materials back into use.



A responsible supply chain in practice

We take pride in our commitment to partnering with businesses that share our values of working sustainably and ethically, to the highest standards. RJ McLeod, our balance of plant contractor for our flagship sites Kype Muir and Kype Extension, takes clear, practical steps to reduce its environmental footprint and promote an exceptionally high standard of health and safety on the sites. RJ McLeod is local to the area and follows core principles that align with our sustainability approach, including:

Intelligent design of the site to reduce waste and environmental impact:

- Construction of ‘floating’ roads rather than standard excavated roads to reduce peat disturbance and carbon emissions.
- Ensuring peat use and reinstatement is close to the extraction location, aiming to reinstate all peat extracted.
- Working with reduced concrete volumes within foundations which reduces the materials used and the deliveries needed (and associated carbon emissions from these).
- Reducing the usage of timber and steel products by utilising foundations rather than standard timber or steel frameworks.
- Maximising onsite storage to avoid unnecessary deliveries.
- Working with local charities/enterprises to re-use materials rather than send to landfill.

Actions to reduce third-party emissions onsite, which sit within OnPath’s Scope 3 GHG inventory:

- Using modern plant hire to optimise energy performance.
- The use of on-demand generators, and where possible, solar cell generators to power smaller welfare set-ups for workers.
- Training plant operators on the importance of energy management.
- Using higher efficiency LED tower lights.

RJ McLeod is also committed to hiring locally and maintains the following ISO certifications:

- ISO 14001 – Environmental Management
- ISO 50001 – Energy Management
- ISO 9001 – Quality Management
- ISO 45001 – Health and Safety at Work

Future circularity at OnPath

As we seek to deliver significantly more renewables projects in the coming years, particularly our solar and battery projects, recycling and responsible waste management become even more crucial aspects of our operations and have become a strategic focus for the business.

In 2025, we aim to develop a circular strategy with a particular focus on minimising the use of virgin materials in our major components and their related end-of-life waste. This will help us manage these components in a sustainable way, not just at the point of decommissioning but also throughout the lifetimes of our assets. As part of this plan, we have been exploring how to build circularity into our projects through the use of refurbished or recycled parts. Commitments that allow future O&M contractors to use refurbished parts have been included in the contracts for our most recent wind farm – Mill Rig, for which construction starts this year.

We are also aligned to the Coalition for Wind Industry Circularity (CWIC) – a working group, driven by industry and the University of Strathclyde, aiming to develop the circular economy for wind in Scotland.

We believe onshore wind circularity will play a key role in delivering environmental and commercial benefits to the region, and we plan to incorporate recommendations from the CWIC into our future strategies.



Embedding sustainable design principles into our projects to deliver the highest environmental standards

Our target:
100% of new projects to have either a habitat management plan (HMP) or biodiversity action plan (BAP) in place.

Underpinning our climate and nature commitments is our overarching pledge to sustainable design principles, recognising the impact that our project design will have on ecosystems, habitat, flora and fauna. We strive to design our projects in a way which is sympathetic to the local environment, while continuously pushing boundaries in sustainable design, resulting in best-in-class examples such as our Kype Muir Wind Farm being used by the UK government as a best

practice example in its guidance for onshore wind developments.

We pride ourselves on our technical capability, dynamic problem solving and dedication to high standards. We follow a robust environmental policy, comprising ten guiding commitments that support the continued sustainable development of our business and encourage the implementation of the highest practicable environmental standards through innovation and continuous improvement. View the [full policy here](#).

We find creative ways to deliver sustainable solutions that respect both nature and communities, enabling us to deliver projects that create lasting benefits, and in many cases, transformational change. We have secured consent (six times) for the UK's

tallest turbines, along with consent to build turbines up to 251m tall at the Lethans Extension Wind Farm in East Ayrshire – currently the highest consented in the UK.

We were recently shortlisted for the In-House Planning Team of the Year category of the 2024 Royal Town Planning Institute (RTPI) Awards for Planning Excellence. The nomination recognises our approach to high standards and the work our planning team does with national and local authorities, statutory consultees and local communities on the fine detail of each project.



Bodinglee Wind Farm: Our commitment to sustainable design principles in action

Following extensive community engagement, we developed a comprehensive nature-positive masterplan for Bodinglee Wind Farm, our largest planned wind farm to date.

Working closely with the community; topic experts on ecology, heritage, landscape, engineering, hydrology and forestry; and the landowner, Douglas & Angus Estates, enabled us to create land management plans that will support native habitat and local species across 1,344 acres of the site. Feedback on early proposals was also sought from organisations including NatureScot, Historic Environment Scotland and South Lanarkshire Council. We incorporated a range of engagement, research and assessments to shape the plans, including liaising with traditionally

underrepresented groups to identify local issues.

This guided us to create three key themes within the plan: **A just energy transition** to help decarbonise homes in the area and reduce energy bills; a **nature positive** approach to restore vital habitats and access to nature; and a range of **heritage initiatives** enabling communities to understand, value and enjoy their local heritage.

Through the proposed habitat plans, we aim to support the recovery of key biodiversity in the region while also helping to tackle climate change through the sequestration of an estimated 6,300 tCO₂e from the atmosphere, largely through careful management of peat bogs. The plan incorporates the restoration of large areas of good quality heather moorland, up to 11 hectares of peat bog restoration, 37 hectares of peatland habitat and further

72 hectares of rush pasture enhancement through ditch blocking to improve water retention and control erosion of peat hags. Areas of native broadleaved planting in the form of riparian planting along watercourses will be incorporated across the area, together with edge planting to conifer plantations and smaller blocks of conifers scattered across the site. These will benefit biodiversity as a whole, with particular benefits for breeding waders and Black Grouse.

The local communities expressed an interest in land to be made available for environmental projects such as woodlands, wildflower meadows, orchards, and vegetable gardens. The plan also includes the creation of a network of footpaths, cycle paths and bridleways – increasing the access to nature for local communities. We hope for a successful planning permission outcome during 2025.



1344
acres
new habitat
management



11
hectares
of peat bog
restoration



72
hectares
of rush pasture
enhancement

Developing together

We are a team of individuals that share one vision: to create a more sustainable future together. Our people are instrumental to our success, they are the true ambassadors for OnPath, helping us communicate our vision and drive our progress with enthusiasm and commitment.

Cultivating a diverse, inclusive and supportive work environment is key to our approach: we aim to be a beacon of excellence in the renewable energy sector, fostering a culture of inclusivity, collaboration and environmental stewardship. We aim to empower our team and to provide the support they need to grow and to thrive. This is our people promise, something that we call ‘Developing Together’.



Our commitments

- 1 Support an inclusive, diverse workplace where employees are valued, respected and listened to**
- 2 Nurture and develop your talent and skills**
- 3 Create a working environment where your health, safety and wellbeing is our priority**
- 4 Provide you with fairly-paid and sustainable employment in an engaging environment**

“It is our people who run through brick walls, break down barriers, find solutions to challenges, deliver positive outcomes and create value. We need to invest in and develop those people who are willing and able to do what so many cannot. It’s our people who create real value through their daily action, that’s what we call ‘Developing Together’.”

Gordon Thomson, Projects Director, OnPath Energy

Our 2024 developing together highlights:

- Employee satisfaction and engagement (our NPS score) increased from ‘good’ to ‘excellent’
- Launched a new learning management system with approximately 800 hours of training in 2024
- Introduced our new health and wellness strategy
- 100% of planned Safe Work Observations completed in 2024
- Accredited as a Living Wage Employer for all employees and Tier 1 contractors



Developing Together

Our material impacts, risks and opportunities		
● Positive	Enhanced transparency, employee engagement and satisfaction through improved staff communication and surveys.	A focus on workforce health & wellness, as well as regularly reviewing staff benefits, leading to improved employee satisfaction.
● Negative	Poor labour conditions in upstream supply chains for raw minerals, particularly those used in batteries and solar panels.	
● Opportunities	Creating new jobs and hiring locally may increase community support and strengthen planning applications.	
● Risks	Industry-wide workforce shortages may delay projects and hinder hiring/retention.	Increased use of batteries and rare minerals raises ethical sourcing concerns.

Supporting an inclusive, diverse workplace

Our target:

Maintain gender diversity at the executive team and increase representation at director/senior level

We are committed to treating everyone with respect and dignity and providing equal opportunities for all our employees. We believe that a diverse and inclusive workplace drives problem solving and innovation, enhances employee morale and reflects the diverse communities we serve. When seeking new talent, we take a local hiring approach, with targeted recruitment for

underrepresented groups to further build out our diverse team.

By supporting each other and finding, nurturing and celebrating the unique talent that each of us brings to OnPath, we all prosper. Our strong values of teamwork and inclusiveness shine through in our tightknit community, where everyone is valued.

Our equality, diversity and inclusion (EDI) policy guides us in our daily interactions. It details our firm stance against discrimination, harassment, and victimisation within our organisation, and outlines our compliance with relevant legislation such as the Equality Act 2010. The policy is available to all employees via the company intranet and included in the onboarding of all new hires.

Our people data:
Headcount: 81*
Gender diversity employees: 58% male, 42% female
Gender diversity board: members: 10 male, 2 female

*As of 31 December 2024



Measuring employee satisfaction

Listening to our employees forms a crucial part of our people plan. We conduct two employee surveys a year to gather insights and feedback on our culture, ways of working, and how we can improve. Based on the insights, we make a plan of action and monitor employee sentiment following any new initiatives.

As a result of our survey in March 2024, we made a variety of improvements summarised here. These are summarised below. Following the changes, our employee NPS score (a standard monitor of employee satisfaction and engagement) increased from 30 in March 2024 (considered as ‘good’) to 68 in November 2024 (considered as ‘excellent’). Our November survey had a response rate of 67%.

● **Communication:** To improve employee awareness of business and team initiatives, we implemented quarterly updates on key business activities plus a quarterly newsletter for teams to share updates. We also included more visual promotion of OnPath’s vision, aims and goals around the offices to provide daily inspiration and reinforce our shared purpose.

● **Health and wellbeing:** We introduced weekly fruit baskets in each office to support healthy eating habits and arranged lifestyle workshops and competitions to encourage health and wellness. We also provided mindfulness colouring books for beneficial breaks, and games to encourage social interaction in kitchen and lunch areas.

● **Employee benefits:** We reviewed and enhanced a range of our employee benefits, including increasing maternity and paternity leave allowance and pension contributions; and enabling sick pay allowance to start earlier, from 6 months’ employment. Other benefits include flexible Bank Holidays to give employees more autonomy over their time off.

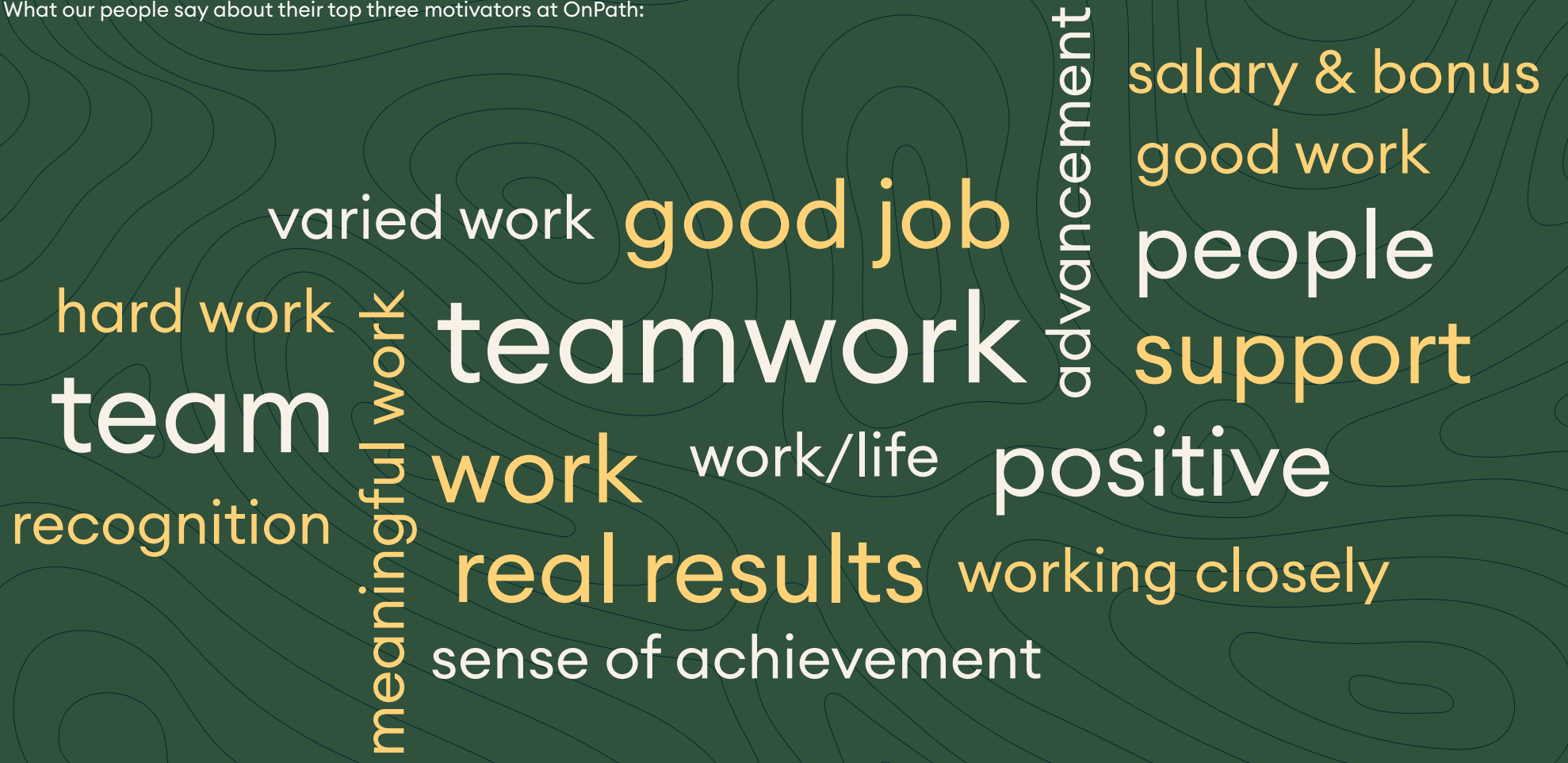
● **Training and development:** We initiated the roll-out of a new learning management system to host our learning resources and planned significant updates to our Graduate Training Programme.

● **Society:** We introduced more plans for office social activities and charity fundraising.

We have delivered a new flexible working policy, helping support a health work/life balance



What our people say about their top three motivators at OnPath:



Nurturing and developing our peoples' talent and skills

Our tracked metrics:

Total training hours across the workforce and average training hours per employee

Training and development are key to empowering our team to drive sustainable growth. Our training and development strategy focusses on equipping our employees with the necessary skills, knowledge and competencies while also fostering a culture of continuous learning and development.

By supporting our employees to continuously develop, we empower them to perform to their highest potential. We provide the space to grow by encouraging

internal progression, giving responsibility, empowerment and trust to enable people to take on new challenges.

Making the right start: a comprehensive onboarding programme

We want all new employees to feel fully supported as they start their OnPath journey. Our comprehensive onboarding programme includes company-specific and technical training as well as a strong focus on the importance of renewable energy and sustainability. We pair new hires with experienced mentors who can guide them through their initial months, helping them understand the company culture and technical aspects of their roles.

800
of total formal training hours

9.9
average hours per employee



Training programmes to nurture our talent

We offer Graduate, Management and Leadership Development programmes, in addition to specific training courses tailored to the needs of the individual.

A key focus in 2024 was developing our new Graduate Training Programme, set to launch in 2025 as part of our ongoing commitment to nurturing talent from the very outset. Spanning 24 months, the programme will offer a blend of structured training, hands-on experience, and mentorship opportunities. Graduates will have the chance to rotate through various departments within the organisation, gaining invaluable insights into different facets of our business while honing their skills and discovering their passion. They will be paired with seasoned mentors who will provide guidance, support and constructive feedback throughout their journey.

This programme is an extension of our previous graduate scheme under Banks Renewables, which has been instrumental in not only developing future leaders but in helping our people uncover hidden talents, as two former participants of the programme showcase in the employee spotlights below. We also

plan to establish apprenticeship schemes in the coming years to support school leavers in developing practical skills for their future careers.

Our Management and Leadership

Development programmes (also currently under development) will provide training in key management skills such as project management, financial management, and team leadership, tailored where possible to the renewable energy industry. We also intend to develop cross-functional leadership training to reinforce the interconnectedness of different areas, such as engineering, environmental impact and financial performance.

Technical and sustainability training

Renewable energy technologies are constantly evolving. To keep our employees up to date, we offer training on the latest advancements such as wind turbine technology, solar panel efficiency, battery storage systems and grid integration. We also provide opportunities for employees to earn industry-recognised

certifications, such as those from the Institute of Energy (IET) or Renewable Energy Association (REA).

We conduct workshops on environmental sustainability, climate change and the role of renewable energy in reducing carbon emissions, and we support employees in obtaining green certifications, such as Certified Energy Manager (CEM), LEED accreditation, and other sustainability-focused credentials.

Soft skills and interpersonal development

We partner with external experts to help our people develop or enhance other useful competences such as communication, teamwork, collaboration skills and cultural inclusion. Developing these skills is especially useful for our cross-disciplinary projects where engineers, environmental scientists, and business professionals work closely together. We also provide training in change management, equipping employees with skills to manage and adapt to change – essential in the rapidly evolving renewable energy sector owing to technological advancements and regulatory shifts.

Continuous learning and development

We encourage a culture of innovation by creating opportunities to work on improvement activities within our business, where employees can experiment with new ideas, collaborate with others on process improvements, and bring new ways of working to life. We are also investing in a new digital learning platform where employees can access a range of online courses, webinars and resources related to renewable energy, sustainability and personal development. The learning management system (LMS) will also host our policies and related training in engaging quiz formats.

Training data for 2024

In 2024, our employees undertook around 800 hours of training, however this is an approximate figure. As we establish a formal tracking process through our new LMS, we will be able to provide more accurate insights for 2025 onwards. We

are also categorising our training into mandatory training (for example training on our policies such as health and safety, cyber security etc.) and developmental training, such as soft skills, core skills or functional/technical skills to further enhance our oversight.

Career development and performance evaluation

We want our employees to grow with the business. We aim to clearly define internal career paths and provide guidance on how employees can progress within the company, whether they aspire to become technical experts, project managers or functional leaders. We offer job rotation programmes or secondments to other departments, projects or even international offices, providing employees with diverse experiences to broaden their skills.

Equally important, we conduct regular performance management reviews to ensure we are recognising and rewarding performance, whilst determining

opportunities for further development and career progression. We encourage the implementation of personal development plans for each employee, outlining their career goals, and required training, mentoring and coaching needs. Regular reviews are conducted to track progress and adjust goals as needed. In each calendar year, every employee at OnPath can expect to have at least two performance review discussions to assess their performance in role, development needs and career progression opportunities.

We regularly assess the effectiveness of our training programs through employee feedback, performance reviews, and metrics such as project success rates or innovation outcomes. We use the insights to continuously improve our training and development strategy, ensuring it evolves with industry trends and employee expectations.



Employee spotlights



Gordon Thomson, Projects Director

Nearly twenty years ago, Gordon Thomson joined our team as a fresh-faced, rugby-loving graduate eager to make a difference in the world. Gordon's career progress is a shining example of our 'Developing Together' commitment to our people.

How did the graduate scheme benefit your career and contribute to where you are today?

The graduate development programme gave me a broad perspective on development. It taught me the importance of understanding the impact and socio-economic acceptability of projects, whether it's a wind farm, a mine, property

development or a data centre. The programme provided insights into planning, finance, engineering, PR and community relations, setting me on the right 'Path' from the start.

How has the business and your colleagues supported your career journey?

I was given the opportunity to be part of a team involved in every stage of the development process, from site finding through planning, consultation, construction and operation. This experience has been invaluable. Developing wind farm projects like Kype Muir, Kype Muir Extension, Middle Muir, Mill Rig, Lethans and Lethans East took the best part of 12 years, and I got to see every stage. From an industry perspective, this breadth of involvement is rare, but the business supported me by giving me the space to learn and grow without fear of chastisement.

Throughout my career, I have been fortunate to work with a lot of extremely talented people and have received many valuable lessons from colleagues past and present. I still look for this guidance from each and every person at OnPath to this day.



Katie Walvin, PR and Digital Content Creator

Katie joined the Graduate Programme in 2022 after graduating from Sunderland University with a Master's Degree in Media Production. Three years on, Katie believes the hands-on, supportive approach to development at OnPath has enabled her to take on challenges and develop skills she didn't realise she had.

How has your role progressed at OnPath since joining as a graduate?

When started, my role was quite 'behind the scenes', focusing solely on video content and a little bit of social media, some photography, PR etc. Now, it's a lot more front facing, engaging more personally with communities, stakeholders etc., and I integrate into other areas of the business, such as business

development and HR. Whilst creating content is still one of the main aspects of the job, I've shifted to a more strategic role, devising communications strategies for projects, which I really enjoy.

How did the graduate scheme benefit you, personally and professionally?

It gave me access to a huge range of projects that I otherwise wouldn't have been exposed to - not just development projects put community ones too. And instrumentally, it gave me access to talented people (both internally and externally) who have shared so much of their insights, expertise and personal experiences over the years; not just through formal training but conversationally and observationally too.

How do you see the business and your colleagues supporting your career journey?

The whole team have always been so generous with their time and knowledge. I have a great manager and she has seen skills and abilities in me that I probably haven't noticed in myself. She is always encouraging me to utilise them and largely the reason why I haven't just sat in a cupboard making videos for the last three years, as much as I enjoy it!

Creating an environment where health, safety and wellbeing is our priority

Our targets:

Achieve 95% of planned safe work observations (SWOs)

Provide onboarding training to 100% of new employees and contractors

Maintain a cumulative high-risk incident frequency rate of less than 1.5 per one million hours worked

We are deeply committed to the health, safety and wellbeing of our people – both on and off the job. We recognise that our responsibility extends beyond simply providing a safe workplace; it’s about fostering an environment where every individual feels valued, supported and empowered to thrive physically and mentally. As such, we make health, safety and wellbeing an integral part of everything we do. These principles are woven into our training programmes, reinforced through robust controls and championed in our communications and daily operations.

Our Health, Safety and Wellbeing Policy outlines our expectations across all levels of the business to uphold our safety standards. All employees have access to the policy via the company intranet, and all employees and contractors receive health and safety training during onboarding. We also provide

specific training focused on risks associated with renewable energy installations (e.g., working at heights, electrical safety and hazardous materials handling) where relevant. We continually review our health, safety and wellbeing standards for improvements.



Safe Work Observation Programme

Our Safe Work Observation programme (SWO) aims to ensure that the high and medium-risk work performed by workers and contractors is regularly monitored by supervisors and managers, and that constructive feedback and safe work-related coaching is provided to work crews and their immediate supervisors. The SWO programme comprises the following core elements:

Assessing how the ‘Life Saving Rules’ are applied to the task being completed.

Assessing control measures (‘hierarchies of control’) in place at work locations.

Sharing observations with the work crew and listening to their feedback.

Tracking quality of job planning at our work sites.

Ensuring positive reinforcement throughout.

100%

Our target is to reach 95% of planned SWOs each year. In 2024, we achieved 100% of our planned SWOs, carried out by OnPath’s wind farm managers as part of their individual KPI’s.



Health and wellness strategy

Our health and wellness strategy guides us in promoting a healthy work environment, preventing health-related issues and supporting our employees' physical, mental and emotional wellbeing.

We offer health screenings, check-ups and voluntary health plans; provide access to onsite or local gym facilities, fitness classes and cycling to work schemes; and promote healthy eating by providing fresh fruit in our offices and educational materials relating to nutrition.

For mental health support, we offer an Employee Assistance Programme (EAP) in which employees and their families can access confidential counselling and support services. We offer mental health awareness training for managers and staff to identify and address issues early and we organise workshops on mindfulness, stress management and resilience. Trained Mental Health Champions across the business act as points of contact for mental health concerns.

Sustainable lifestyles

We aim to engage and inspire our employees to make healthy and sustainable lifestyle choices through our healthy and sustainable living programme. The programme includes a series of workshops providing tips on energy saving measures in the home, food storage advice to prevent waste and save money, and upcycling advice for home furnishings. We also plan to hold these workshops in our local communities to support wider sustainable living.

We conduct regular surveys to determine the effectiveness of our health and wellness initiatives. Our HR team oversees the implementation of our wellness programmes, provides support and ensures policies are followed, while our Health and Wellness Project Team, comprising volunteer employees, help drive wellness initiatives, gather feedback and promote our programmes.



Providing our people with fairly paid, sustainable employment

We are a
Living Wage
Employer

Our target:

Committed to maintaining living wage accreditation

We are proud to be an Accredited Living Wage Employer, certified by the Living Wage Foundation. A living wage provides a decent standard of living, allows workers to spend more time with their families, save for the future, and it gives them the means to improve their mental health and life outside of work. Our accreditation means that we will provide a fair, living wage for our employees, and we have extended this commitment to all Tier 1 contractors.

Beyond the living wage, we strive to offer attractive benefits to our employees to reward them for their dedication to our vision. These include a range of family-friendly policies and benefits, and the wellness initiatives and programmes mentioned earlier.



Supporting a just transition

We believe in a just transition to renewable energy which is fair, inclusive and benefits everyone, with nobody left behind. This means placing local communities at the heart of the transition to a greener future. It means harnessing the power of wind and solar energy to drive down energy bills for UK households and increase national energy security.

It means investing in local businesses and creating local jobs. It means channelling

project revenues into community benefit funds, steered by the community, to create transformational change where it's needed most.

This is how we support a just transition, something we call the 'OnPath Together' approach.

OnPath Together means showing respect and responsibility in the communities we work in. It comes from a deep sense of care for the people and environment nearby our projects and is guided by our values towards each.

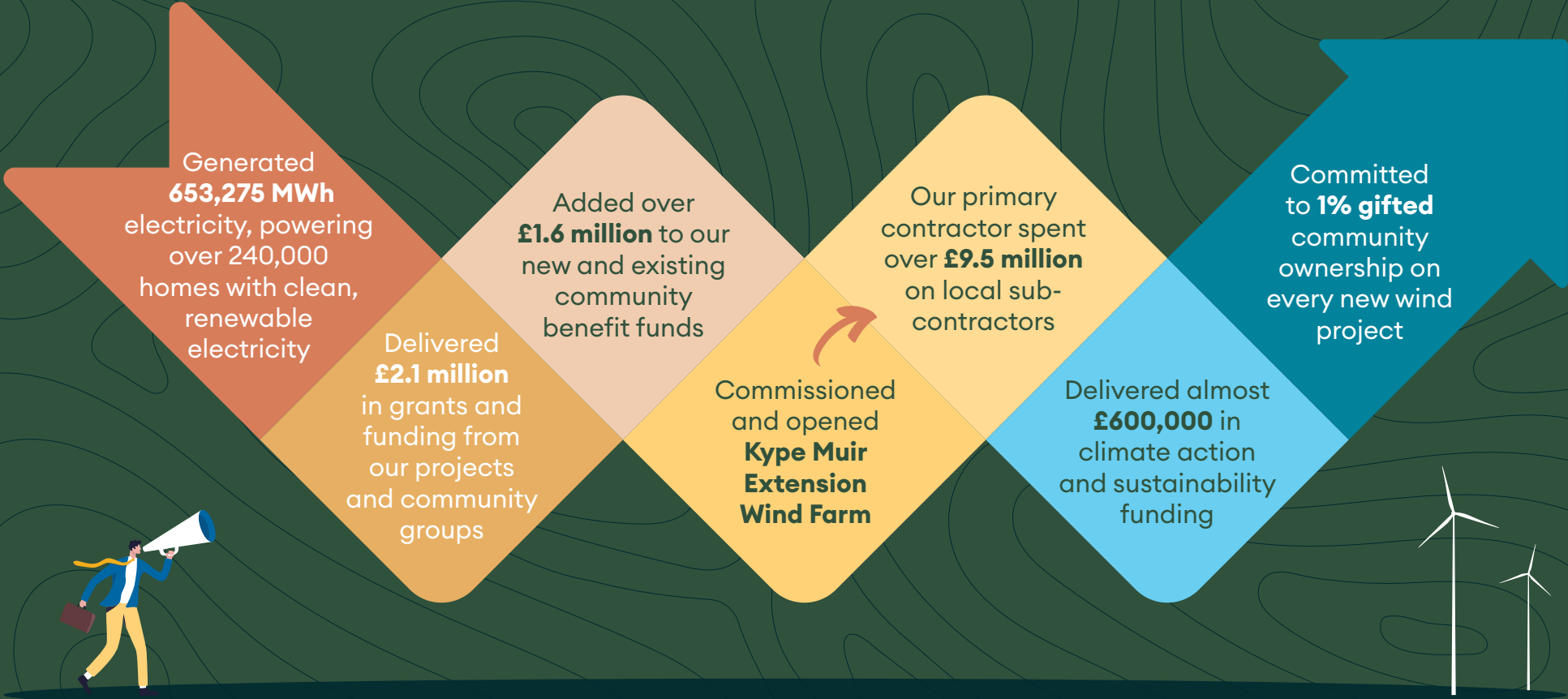


Our commitments

- Listen to the needs of the community and deliver open, collaborative consultations with transparency and integrity
- Enable communities to lead change at a local level through sustainability and climate action
- Provide community benefits which reflect the priorities of the local community
- Supporting local communities with investment, jobs and skills
- Deliver reliable, affordable renewable electricity for consumers across the country

Our projects are more than just a means to create renewable energy, they are community-led projects that benefit everyone.

Our 2024 just transition highlights:



Supporting a just transition

Our material impacts, risks and opportunities				
Positive	Affordable renewables energy provision improves social equity and supports the transition to net-zero.	Community investments and grants maximise local social, economic and environmental benefits, enhancing local community building.	Maximising local spending throughout development process, enhancing economic benefits for local businesses and individuals.	Enhancing access to heritage sites, community spaces and green space as part of our large-scale developments, creating positive social value.
Negative	Potential disruption to heritage sites, community spaces and natural assets during development.	Disruption leading to amplification of anti-renewables sentiment, delaying the energy transition to net-zero.		
Opportunities	Sustainable community benefits, renewable energy access, improved access to nature/ cultural heritage and jobs creation can all result in stronger planning applications.	Incorporating local ownership elements and other engagement tools into our renewable energy projects can lead to enhanced community support for our projects and inspire climate action.	Opportunity to improve broad environmental awareness and subsequently the demand for renewable electricity with PR and marketing campaigns.	
Risks	Discovery of heritage assets may delay projects due to regulatory requirements.	Noise or safety concerns may prompt community opposition, damaging reputation and delaying projects.	Insufficient engagement due to above concerns could lead to opposition, weaker weaker planning applications and increased costs.	

Listen to the needs of the community and deliver open, collaborative consultations with transparency and integrity

Our targets:

100% of projects to include a locally distributed community information leaflet with details of the consultation.

100% of projects to have a dedicated website and feedback portal during construction.

We work hand-in-hand with communities to develop projects that deliver lasting benefits. The OnPath community partnership approach, cultivated over decades through the Banks Group, is now a leading example in the UK energy sector.

We go above and beyond to engage with local communities to give everyone the opportunity to share their views on how our renewables projects develop.

We believe that better projects come through listening, collaborating and delivering with care and consideration.

Our projects are more than just a means to create renewable energy, they are community-led projects that benefit everyone.

Here’s how we put our approach into action:

We treat communities with respect and consideration, ensuring their values and needs are incorporated into our proposals from the very start.

Our community consultations are wide and inclusive, enabling everyone to have their say in a way that works best for them – in person, online or at community events.

We build a sense of togetherness and ownership for all involved in our projects. We want our communities to feel proud of their local project.

Community engagement from the outset

To help everyone understand and embrace our vision for green energy, we start engaging with local communities right at the start of the process, sharing clear information about our proposals and speaking directly with local communities to understand their values, issues and needs. We create community liaison groups and work with local community councils and local residents. We hold in-person events, door-to-door consultations, online forums, surveys and communicate through our website.

We take an iterative approach to our project designs, refining plans over the course of many months as we incorporate local feedback to ensure that we meet the community's needs. We seek to continuously learn what we can improve upon throughout the consultation, construction and operation phases.

National recognition of our community approach

In 2024 we were shortlisted for the Best Engagement Award at the Scottish Green Energy Awards for our community outreach during the building of the Kype Muir Extension Wind Farm. The extension to the existing wind farm added more than 67.2 MW of generation capacity to the area's renewable energy resources, enough to power over 53,000 homes. Throughout the development, neighbouring communities were consulted extensively. To support this engagement, we leveraged the highly successful Kype Muir Community Partnership (KMCP) that we established in 2019 as part of the original Kype Muir Wind Farm development. The KMCP is comprised of representatives from the five local community councils who direct the funding to where it's needed most in their communities. The relationship we've built over the years through the KMCP helped us take on valuable community feedback when planning the extension.

The Kype Muir Extension Wind Farm officially opened in September 2024, with local community members, business partners and government officials present for the opening. Local school children were invited to submit potential names for the turbines, with three deserving winners.

Kype Muir and Kype Muir Extension are expected to deliver more than £21m worth of community benefits during their lifetimes and will directly and indirectly support around 800 jobs. The two sites will generate over 155 MW annually, providing renewable energy for more than 123,000 homes, equivalent to a city the size of Aberdeen.

“The Kype Muir Extension project truly demonstrates the power of community partnering to maximise the social, environmental and economic benefits of onshore wind farms. Executed correctly, benefits are shared fairly between the operator, local authority and the communities surrounding the project.”

Robin Winstanley,
Sustainability and Community Director



Deliver community benefits which reflect the priorities of the local community

Our tracked metrics:

Track the total spend given to community benefit funds

Total spend of grants given from our community funds

At OnPath, we believe that those who live close to wind farm developments should benefit socially, economically and environmentally from our projects. It's socially just and helps make our developments more sustainable. The best way to achieve this is by working hand-in-hand with local communities, administering our community funds through local partnership schemes which direct the

funding towards projects tailored to local issues, identified by local people.

By investing in projects with community-driven action at their core, we can help create long-lasting change where it's needed most. We believe this approach sets us apart from other project developers. It is an approach deeply embedded in our DNA, stemming from our origins as a land developer as part of the Banks Group.

Our community promise is brought to life by:

Working with local stakeholders including community councils, parish councils and local residents to develop a tailored approach for every project.

Creating local community advisory panels to identify and advise on local causes to support with the community funds.

Supporting and investing in eligible community groups and voluntary organisations to provide new and improved community amenities and environmental enhancements.

In 2024, we delivered over £2.1 million in community funds from our renewables projects, supporting over 100 community groups and environmental projects in Northern England and Scotland.

Community Benefits:
We offer an annual baseline of
• £5,000/MW for Onshore Wind
• £500/MW for Solar PV



Total grants made in 2024:

£2,117,619



Which includes
£346,305 for jobs and skills initiatives in South Lanarkshire



Total delivered to community funds: **£1,564,702.68**

Region	Amount Awarded
Scotland	1,942,872.46
North East	60,736.47
South Yorkshire	52,337.44
Cumbria	38,395.00
Lancaster	15,706.83
Yorkshire	7,572.44

**Community benefits in action:
The Kype Muir Community
Partnership**

We're extremely proud of how our Kype Muir and Kype Muir Extension Wind Farms have supported local businesses, people and community projects. As detailed earlier, the Kype Muir Community Partnership (KMCP) has been leading the delivery of community benefit funds from the Kype Muir Wind Farm since 2019, awarding almost £800,000 to benefit community groups within 10 kilometres of the site.

The KMCP has two funding pots: one allocated to smaller, localised, grassroots projects and one for larger, strategic projects which benefit the wider region.

Guided by individual community action plans, the KMCP can respond to different local priorities so that community benefits are felt by those that need it most.

**We support
establishing community
partnerships for
community benefits
and ownership**

As well as addressing local issues, the funding helps address globally recognised initiatives supporting the UN Sustainable Development Goals (SDGs).

The UN SDGs are used by governments and businesses around the world to guide and measure performance against development indicators.

Throughout its lifetime, the KMCP has contributed significantly to a number of SDGs in South Lanarkshire:



Annual funding is set to increase following the opening of the Kype Muir Extension – now owned by Shroeders-Greencoat after being developed and sold by OnPath.

This additional funding, delivered by the same local panel, makes the continued partnerships with the local authority, community councils, grassroots organisations and other stakeholders even more instrumental in driving change where it's needed most in the local communities.

Supporting local communities with investment, jobs and skills

Our targets:

We commit to £1million per MW being spent within 60km of all new wind projects

We aim for 65% of the lifetime spend on a windfarm being spent locally

Investing in local economies

As part of our OnPath Together approach, we are committed to building a local supply chain, boosting the local economy, delivering jobs and long-term economic benefits. We believe it's better for everyone involved if local people benefit. We hire locally wherever possible, create long-term partnerships with local businesses and guide our suppliers to subcontract locally. We require tenders for work to include a statement of local economic benefits and we prioritise local businesses on our tender lists.

The biggest opportunity we can bring to local economies relates to the installation and operation of the wind farms. Local firms that typically benefit from our projects include those providing the facilities and infrastructure such as access roads, crane pads and turbine foundations needed to install the turbines. Other opportunities involve the development and design and the electrical grid connection, with long term local opportunities also existing in the ongoing operations and maintenance of the wind farms.



Keeping it local: Our partnership with R J McLeod

Our commitment to hiring locally was most recently demonstrated in the development of Kype Muir Wind Farm Extension. Our principal contractor, R J McLeod spent almost £10 million on local subcontractors within 50km of the project throughout the build.

The firm itself is headquartered in Glasgow and employed 15 members of staff on the project, a further 20 on sub-contracts and a further 75 as labourers, most of whom lived locally.



Kype Muir Extension local spend:

Region	Total	Percentage of total spend %
Within 30km	£5,197,661.26	34.68%
Within 50km	£4,398,180.68	29.35%
National	£5,390,482.46	35.97%
Total	£14,986,324.40	100



Lorcan Hayes, site agent at R J McLeod, on site at Kype Muir Wind Farm

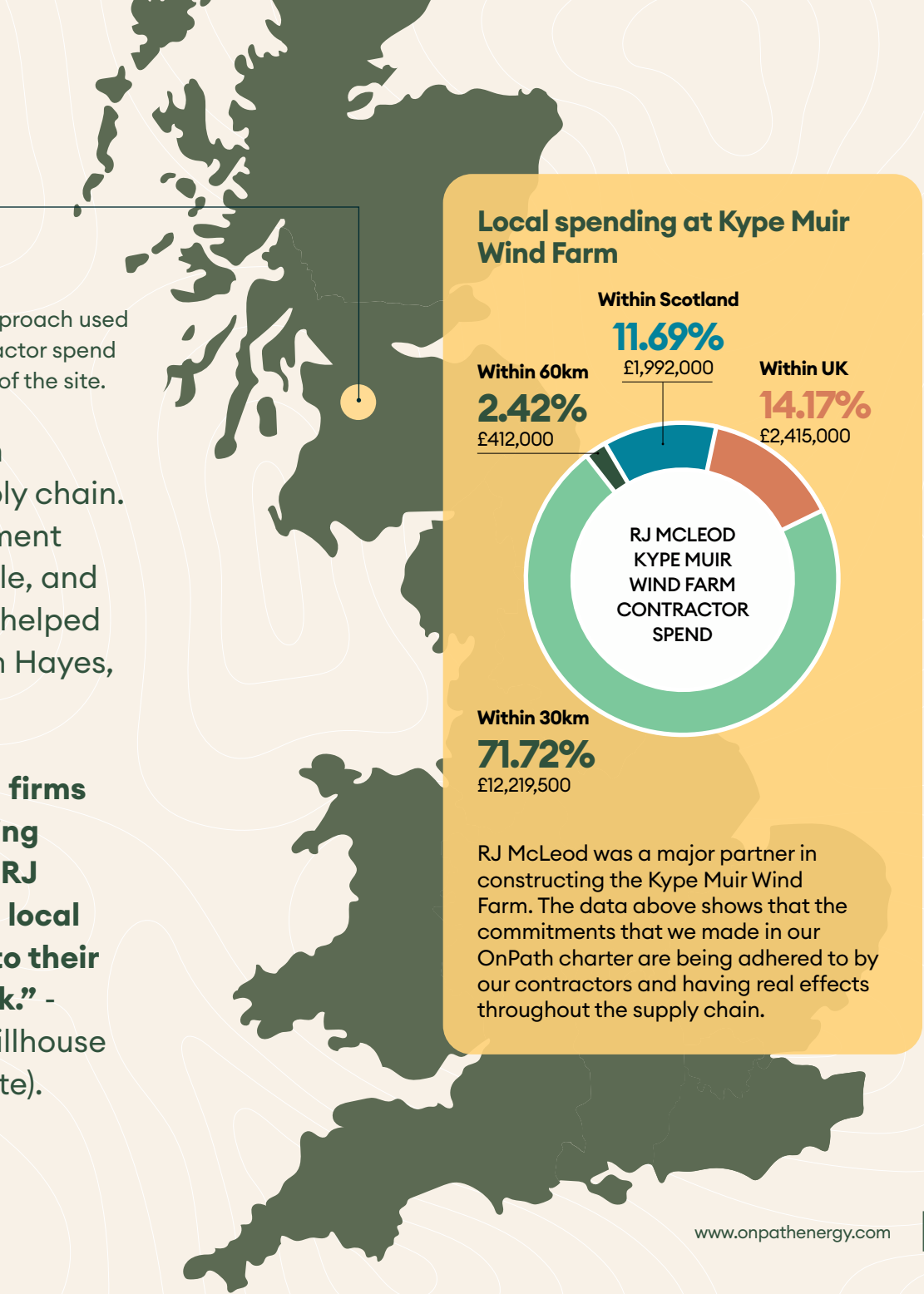


Kype Muir
26 Turbines

The approach we took for the Kype Muir Extension mirrors the approach used for the original Kype Muir Wind Farm, in which over 70% of contractor spend (around £12 million) was on sub-contractors located within 30km of the site.

“As part of the tender for the contract, OnPath required us to confirm details of the local supply chain. I am therefore really pleased that our commitment to use as many local subcontractors as possible, and indeed that we ourselves are a local business, helped us to win such a prestigious contract.” - Lorcan Hayes, Site Agent at R J McLeod.


“It’s good to see a developer prioritising local firms throughout the supply chain – and then sticking to their word. Our contract is principally with R J McLeod, who likewise are committed to using local businesses wherever possible thanks in part to their agreement of the OnPath Together framework.” - Gordon Campbell, Commercial Manager at Hillhouse Quarry (supplier of sand and gravel for concrete).



Supporting local skills and job development

We also partner with South Lanarkshire Council to boost jobs and skills in the local area through a dedicated fund.

To date, the jobs and skills fund has supported around 2,000 people in South Lanarkshire. The initiative uses a tailored approach, from hands-on support like assisting with job applications, to providing college grants or practical equipment such as toolbelts for apprentices.



At least 10 OnPath Education bursaries, worth £500 each, for every project


Supporting the next generation

We want to ensure the next generation has the skills and knowledge to take our vision forward and drive the UK’s innovation in renewables. We collaborate with schools, colleges and community groups to promote STEM education and renewable energy. We also commit to delivering at least ten OnPath Education bursaries (worth £500 each) for every new project we develop.


As part of our commitment to investing locally, we regularly review the benefits we are delivering to local communities and economies to help maximise our impact. View our [Pledge to Communities Review](#) for a full review of these commitments in action when building Kype Muir and Middle Muir Wind Farms, as well as delivering the jobs and skills initiative in collaboration with South Lanarkshire Council.




South Lanarkshire jobs and skills fund

216 


Local people were helped into employment

719 


College/university grants to help with the cost of books, IT equipment, travel etc.

251 


People given grants to help with travel, clothes and lunches when starting a new job

110 


People given training to prepare them for employment

18 


Vouchers issued for interview clothing

30 


Contributions to college/ university course fees

50 

People supported with travel and driving lessons

595 

Local people received some form of non-financial support, which can include support with CV writing, applications and other general guidance

77 

Employers signed up to the programme creating jobs for local people

Enable communities to lead change at a local level with sustainability and climate action



Our targets / tracked metrics:

Community funds are spent on climate action

Offer community ownership on all new wind farms

We help to build climate resilience into communities and empower them to live more sustainability. We support local people in becoming more energy efficient in their homes and community spaces and we provide funding for climate action projects and other

climate-related initiatives. We also offer a share in the ownership of all our new wind farms to help communities fully embrace the transition.

Rethinking community benefits for an affordable energy transition

Continuously seeking new ways of creating value and benefits for local communities is what we believe sets us apart from other developers. As part of our most recent planning application for Bodinglee Wind Farm near Douglas in South Lanarkshire,

we developed an innovative model of delivering sustainable community benefits that breaks the mould of traditional grant giving. Through extensive community engagement and research, we learned that fuel poverty was a key issue concerning locals, owing largely to the higher-than-average proportion of older, energy inefficient properties in the area which are more exposed to rising energy costs.

Acting on this, we created a plan for the Clydesdale Community Energy Transition Co (CCETCo) – a community owned and led group which will be funded by the totality of community benefits from Bodinglee, once the wind farm is operational.

This community body will provide a service to local residents to assess the energy efficiency of their homes and organise installers for improvements such as increasing thermal efficiency and replacing ageing, fossil fuelled heating systems. Through a study by independent consultants Natural Power, we determined that this could help 6,500 local households save between £2m - £4.4m on their yearly energy bills.

The CCETCo will receive around £1 million a year in funding from Bodinglee Wind Farm, which will pay for the salaries of 1-3 employees and the projects themselves, awarded to local contractors. The CCETCo will enable communities to lead the decision making in their green transition, with all energy improvements 100% funded by the CCETCo.

The community will own the CCETCo through an appropriate legal entity (for example a charity organisation or social enterprise). The governance structure could include support from professional positions funded by the community benefit fund, with advisory positions for South Lanarkshire Council,

£2-4.4 million in bill savings

local councillors, OnPath Energy, local businesses and experts in the area such as the Energy Saving Trust and Local Energy Scotland.

We also offer the local communities a 1% equity stake in Bodinglee Wind Farm at no cost, with a further 9% shared ownership offer.

“The blended benefits package which would result from Bodinglee Wind Farm is innovative in its approach, looking beyond the traditional model of issuing grants from a central pot, seeking to reshape how a just energy transition could directly benefit local households and the wider community.”

Robin Winstanley, Sustainability and Community Director, OnPath Energy

We offer community ownership for all new wind farms, starting at 1% free equity



Community funding for climate action and sustainability

Through our community funds, in 2024, we contributed almost £600,000 to local projects focused on climate action and sustainability. One project involved providing a £5,000 grant to install a new ventilation system in a historic Cumbrian village church to tackle long-term problems of damp and condensation that were deteriorating the Grade II listed building.

A further project involved the expansion of a vital bus service in South Lanarkshire. Run by Climate Action Strathaven (CAS), the service received £41,000 of funding through the Kype Muir Community Fund. This funding enabled the bus service to expand to offer twice as many services between Strathaven, Stonehouse and Glasgow, promoting active travel in the area and helping to cut emissions. It is estimated that the buses saved 510,000 car miles in the first eight months after expansion, avoiding approximately 235 tonnes of CO₂.



“There’s simply no way that we could have afforded to get this work done without the funding we’ve had from OnPath Energy and we’re extremely grateful for their generous support in safeguarding our much-loved church’s future viability.”

Michael Burke, treasurer at St Stephens Church



“The impact the bus service has had on our community cannot be understated, it has been genuinely transformative. Before the bus, young people studying in Glasgow couldn’t get public transport to classes and some elderly people were really struggling with loneliness and a lack of independence – we’re certain the bus service has supported people in those tough circumstances.”

Alison Harley, Programme Manager for Climate Action Strathaven

Delivering reliable, affordable renewable electricity for the UK

Our tracked metrics:

Energy generation from our projects.

Percentage of new projects with local energy initiatives embedded into the planning application.

Onshore wind and solar are among the fastest growing and cheapest forms of energy sources in the world. By harnessing and storing renewable energy generated from these sources on UK soil, and innovating new technologies to maximise efficiencies, our projects are helping drive down energy bills for UK households while boosting long-term energy security for the nation.

“By investing in home-grown renewable energy, we not only drive progress towards net-zero targets, we protect consumers from volatile overseas oil and gas prices, strengthen our national energy independence, create local jobs, and feel the economic benefits of clean energy within our communities.”

Michael Newton
Sustainability Developer





Since 2023,
100% of our
submitted proposals
have included local
energy initiatives

Wind Farm	Generation
Armistead	31,367.00
Hazlehead	16,757.00
Heysham	18,101.00
Hook Moor	25,726.00
Kype Muir	190,759.00
Kype Extension	101,800.00
Lambs Hill	22,978.00
Marr	18,187.00
Middle Muir	95,993.00
Milton Keynes	31,293.00
Moor House	31,056.00
Pates Hill	33,422.00
Penny Hill	35,836.00
Totals	653,275.00

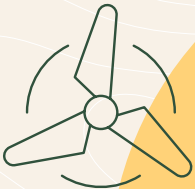
Our quest for continuous innovation has brought leading renewable technology to market such as the installation of the UK’s tallest and most efficient turbine at the Kype Muir Extension. More efficient wind turbines mean more wind power can be converted into usable electricity for households, helping to maximise supply and lower overall costs. And as we expand into solar and battery energy storage systems (BESS), we will strengthen the UK’s capacity for generating and storing clean, affordable energy.

Over the course of their lifetimes, our wind farms have generated over 4,000,000 MWh, the equivalent of around 1,500,000 homes’ annual electricity needs. This clean energy has avoided over 1,000,000 tCO₂e emissions (calculated using historic grid carbon intensity).

In 2024, our wind farms generated 653,275 MWh, meeting the annual electricity needs of around 240,000 homes, and avoiding around 198,000 tCO₂e emissions. The acquisition of two new wind farms in the last year (Pates Hill and Milton Keynes) expanded our capacity, demonstrating our continued ambition for growth and for helping drive the UK energy transition.

Additionally, wind farms which we have developed and then sold continue to contribute to net-zero by providing renewable electricity. For example, Kype Muir Extension (sold in 2024) generates approximately 156,000 MWh per year, powering the equivalent of around 58,000 homes annually. Quixwood Moor (sold in 2015) generates 56,000 MWh per year, powering the equivalent of around 21,000 homes annually.

Since May 2023, all of our planning applications have included local energy access initiatives as an integral part of the project plan. A clear example of this was shown with the Clydesdale Community Energy Transition Co (CCETCo) described earlier: an innovative way of empowering the local community to improve their energy efficiency and reduce energy bills through funding generated by the local wind farm.



Our wind farms have
generated over
4,000,000 MWh to
date, the equivalent
of around 1,500,000
homes’ annual
electricity needs



Being a responsible business

At OnPath, strong business ethics underpin all we do. Guided by our policy framework, we embed responsible, sustainable practices into our operations and our development pipeline. Our policies govern our own standards, how we work with others, and what we expect from those we work with. They outline our commitment to upholding human rights and conducting our business transparently and sustainably. Being a responsible business also extends being these measures, through our commitment to a just transition that tackles climate change, restores nature, and leaves no community behind.



Our commitments

- Uphold human rights and promote sustainability in our value chain with transparent reporting
- Maintain robust cybersecurity and data protection across our business
- Advocate to support the delivery of a fair, inclusive energy transition which restores nature and tackles climate change

Our 2024 responsible business highlights:

- Held training sessions for our internal procurement team on ethical supply chains
- Screened around 280 suppliers and assessed their associated risk level
- Sent ESG questionnaires to key suppliers
- Established an Ethics Hotline for employees to report ethical concerns or seek guidance on ethical issues or behaviours that don't align with our values
- Implemented a suite of cybersecurity tools and third-party monitoring and alert software
- Achieved zero reportable breaches of our Personal Identification Information (PII)

Responsible business: Our material impacts, risks and opportunities

● Positive	Providing improved energy efficiency infrastructure to underserved communities enhances energy security, reduces carbon footprint and delivers business benefits.	Demonstrating strong regulatory compliance enhances reputation, stakeholder trust and creates new project opportunities, helping accelerate the transition to net-zero.
● Negative	The potential impact of a cyber breach releasing important stakeholder data, leading to a loss of trust from customers and other stakeholders.	
● Opportunities	Advocating for policies which will deliver climate action and a just transition for communities presents opportunities to secure more deployment of renewables.	

Upholding human rights and promoting sustainability in our supply chain

Our target:

50% of vendor spend with vendors who have an overarching sustainability policy.

Maintaining an ethical supply chain

We pride ourselves on cultivating business partnerships based on mutual respect and shared ethical values, alongside a vision for a more sustainable future. As our business grows, and as we expand further into solar and battery markets, we are committed to ensuring our supply chain practices continue to follow the highest ethical standards of responsible procurement.

We work closely with Brookfield Renewable to monitor our supply chain to prevent forced labour, unsafe working conditions and the use of conflict minerals. We currently adhere to the Brookfield Renewable Vendor Code of Conduct, which applies to any individual or entity providing goods or services to OnPath Energy. The Code of Conduct describes the minimum commitment to ethical business practice we expect to be adhered to as a pre-requisite to working with us. As we continue to formalise our standards and policies under OnPath Energy, we will be implementing our own vendor code of conduct.

As part of our approach to sustainable, ethical procurement, we have undertaken screening and due diligence across our supply chain in 2024. As well as new training for our internal procurement team, this has involved the screening of around 280 suppliers and their associated risk level. In addition, key suppliers

(by spend) and those in higher risk locations are required to provide information on their ethical business practices through a detailed ESG questionnaire tailored to their industry. This screening, which results in an overall ESG score, is conducted every two years at a global Brookfield Renewable level and for each new supplier that meets our due diligence criteria.

Our key suppliers – representing a majority of the business spend at OnPath Energy – are in the process of being onboarded and assessed as part of our transition to a new, approach to procurement as OnPath Energy. Each of these Tier 1 suppliers has also been confirmed to have their own ESG or sustainability policy in place, which exceeds our rolling target to achieve 50% of our vendor spend on companies and contractors that have a sustainability policy in place.

A robust policy framework guiding our business practices

We are fully aligned to the Brookfield Renewable Code of Business Conduct and Ethics, which outlines the ethical standards and behaviour expected from all who represent OnPath Energy. We are in the process of finalising our own code of conduct tailored to OnPath’s specific operations. Our Modern Slavery Statement underlines our commitment to conducting all aspects of our business in an ethical, responsible manner which supports the protection of human rights.

We condemn bribery and corruption in all its forms. Our Anti-bribery and Corruption Policy details the company’s responsibilities, and the responsibilities of those who work for us, in observing and upholding our position on these issues; and provides information and guidance to those who work for us on recognising and dealing with suspected bribery and corruption incidents.



Whistleblowing

We aim to empower every employee to contribute to a positive, respectful work environment. To support us in upholding our high standards of integrity, transparency and respect, we have an Ethics Hotline in place, for any employee to report ethical concerns or seek guidance regarding ethical issues, compliance or behaviours that don’t align with our company values. The service is available 24/7 via phone or online, and is fully confidential, managed by a third-party to ensure anonymity (where requested) and impartiality. We take all reports seriously and are committed to addressing concerns promptly and fairly, ensuring no negative repercussions for those who speak out and report concerns.

Should a concern be received by Lighthouse, our independent third-party provider operating the Ethics Hotline, the concern is logged and an initial assessment is conducted to determine its seriousness and relevance under whistleblowing laws.

Lighthouse then forwards the concern to our designated point of contact within OnPath for further investigation. All matters are handled confidentially as we assess the evidence and take appropriate action, which may include a formal investigation.

Once the investigation is complete, appropriate action would then be taken if wrongdoing has been established. The whistleblower is kept informed throughout the process, although the level of detail provided may differ by case, dependent upon the nature of the concern raised and the action taken, balanced with legal obligations around confidentiality, data protection and the rights of others involved.





Maintain robust cybersecurity and data protection across our business



- Our targets:**
- Train 100% of employees on cybersecurity annually**
- Achieve zero security breaches on Personal Identification Information (PII)**

Cybersecurity is critical to our business and we work hard to keep our assets and data protected from both physical and digital threats. Following the transition from Banks Renewables to OnPath Energy, a large part of 2024 was spent establishing new systems that follow our ‘Cybersecurity First’ approach and migrating all of our data to these new systems. We have also implemented a suite of cybersecurity tools and third-party monitoring and alert software for all of our systems users. In 2024, we achieved zero reportable breaches of our PII.

Our Cybersecurity Policy, along with a number of supporting policies and procedures, details our expectations and requirements for the secure and reliable operation of information technology (IT) and operating technology (OT). We segregate systems that manage operational sites from all other applications, to maintain the resilience and security of both IT and OT. We employ a multi-layer approach to cybersecurity, with multiple technologies deployed to monitor systems. Our cybersecurity technology, controls, practices, and processes are assessed on an ongoing basis by management to gauge their effectiveness and the overall security posture of the organisation.

Cybersecurity is a company-wide responsibility. As such, all employees are required to undertake cybersecurity awareness training at the time of onboarding as well as an annual refresher thereafter. Additional role-specific cybersecurity training is provided where necessary. We ensure all our employees

are aware of – and trained to detect – potential fraudulent emails and phishing attempts designed to obtain confidential data or passwords. We run quarterly email phishing tests to reinforce this training.

As of 2025, we will begin tracking the completion rates of our cybersecurity training and evaluating its effectiveness. We will also be seeking Cyber Essentials Plus certification in line with recommendations of the UK National Cyber Security Centre, and we will begin conducting formal assessments against the NIST Cybersecurity Framework (CSF).

Data protection forms a core part of our overall security approach, and our Data Protection Policy details how we comply with UK GDPR regulations to keep our data safe. All employees undertake mandatory data protection training and related training as applicable to their role.

Advocating for a fair and inclusive energy transition

Our tracked metrics:

Contributions to collaborative policy with trade bodies

Number of multi-stakeholder events organised or attended every year

We believe we have a key role to play in advocating for national policy which supports the deployment of renewable energy in a way which is fair, equitable and includes all communities – leaving no one behind. With our expertise and strong history of working with communities, and now with the support from Brookfield Renewable, we are better placed than ever to push boundaries, collaborate with others and pioneer new solutions for a just transition to a renewable economy.

Our role in the negotiation and ongoing implementation of the Scottish Onshore Wind Sector Deal clearly demonstrates this. OnPath Energy is part of the G12/S5 Group – an advisory board of 12 developers who helped oversee the 2023 Scottish Onshore Wind Sector Deal – a commitment from the Scottish government and the onshore wind industry to deliver 20 GW of onshore wind in Scotland by 2030 whilst delivering maximum benefits for local communities.

Our role on the panel was to help ensure that commitments being made by and asked of the onshore wind industry were feasible, achievable and meaningful. The measures agreed in the deal include halving the time onshore wind farms take to go through planning (to just 12 months) and engaging with local communities at the earliest opportunity to agree a package of community benefits. The deal also includes a commitment to creating a sustainable solution for a circular economy supply chain for the recycling, refurbishing and repurposing of

decommissioned wind turbine component parts.

Now that the deal has been signed, we continue to act in an advisory capacity, supporting an effective delivery of the commitments made by the industry. We believe contributions like this are vital in our quest to drive a collective vision for renewables in a way which is beneficial to local economies, communities and the environment.

We also know that it will take a united effort and truly holistic approach to reach the UK’s goals of net zero by 2050. We must draw on expertise across sectors to ensure people, nature, communities and economies all benefit from the transformations required to create a more sustainable future. In light of this, we constantly seek to build connections, learn from others and share our own insights by organising and attending collaborative events to help drive this collective vision. We intend to monitor this activity going forward as a further measure of progress.

• The beautiful Black Grouse just one of the many endangered species OnPath have actively encouraged to thrive



Metrics and proof points index

Climate and nature positive			
Commitment	ESRS topic	Target / metrics to track	Progress & performance
We will help tackle climate change and support the transition to net zero	ESRS E1 Climate Change - Climate Change Mitigation ESRS E1 Climate Change - Energy	Achieve net zero for Scope 1 and 2 by 2030	Our 2024 emissions Scope 1: 54.2 tCO ₂ e Scope 2: 330.9 tCO ₂ e
		Achieve net zero for Scope 3 by 2050	Our 2024 emissions Scope 3: 2,584.8 tCO ₂ e
		Double our delivered generation capacity by 2030	In progress from a 2024 baseline of 252 MW
We will protect and enhance the environment and its biodiversity	ESRS E4 Biodiversity & Eco-systems - Land use change ESRS E4 Biodiversity & Eco-systems - Species population size	Achieve a biodiversity net-gain of at least 10% for all new projects	Will be integrated into all new projects
		Area of habitat (M2) maintained or enhanced	Achieved 990,100 m ² of habitat maintained or enhanced in 2024. Integrated into all new projects
Use circular economic principles to design out waste	ESRS E5 Circular economy - Resource inflows & outflows ESRS E5 Circular Economy - Waste	Divert 100% of major components (e.g. turbine blades, tower, rotor and hub) from landfill	Will be integrated into all new and existing projects
		Track waste data from all our operational sites	✓ Tracking in progress. 2024 data: Total non-hazardous waste recycled or reused (all inorganic waste): 1,742kg Non-hazardous waste with unknown disposal method: 1,103kg Hazardous waste recycled: 652kg Hazardous waste (unknown disposal method): 7,588kg
Embed sustainable design practices into our projects to deliver the highest environmental standards	ESRS E4 Biodiversity & Eco-systems - Land Degradation	100% of new projects to have either a habitat management plan (HMP) or biodiversity action plan (BAP) in place as appropriate	✓ Integrated into all new projects

Our people: Developing together			
Commitment	ESRS topic	Target / metrics to track	Progress
Support an inclusive, diverse workplace where employees are valued, respected and listened to	ESRS S1 Own workforce - Diversity	Maintain gender diversity at the executive team and increase representation at director/senior level	Baseline year data established (2024)
Nurture and develop your talent and skills	ESRS S1 Own Workforce - Training & skills development	Track total training hours across the workforce and average training hours per employee	Around 800 hours in 2024. Average of 9.9 hours per employee. A more accurate tracking system is being implemented.
Create a working environment where health, safety and wellbeing are our priority	ESRS S1 Own workforce - Health & Safety	Achieve 95% of planned safe work observations (SWOs)	Achieved 100% of planned SWO's in 2024
		Provide onboarding training to 100% of new employees and contractors	Achieved
		Maintain a cumulative high-risk incident frequency rate of less than 1.5 per one million hours worked	Achieved in 2024 with a high risk incident rate of zero per one million hours worked
Provide fairly-paid and sustainable employment in an engaging environment	ESRS S1 Own Workforce - Adequate Wages	Committed to maintaining living wage accreditation	Achieved in 2024

Our communities: A just transition

Commitment	ESRS topic	Target / metrics to track	Progress
We will listen to the needs of the community and deliver open, collaborative consultations with transparency and integrity	ESRS S3 Affected Communities - Freedom of expression ESRS S4 Consumers & end users - Access to quality information	100% of projects to include a locally distributed community information leaflet with details of the consultation	Achieved for all existing projects
		100% of projects to have a dedicated website and feedback portal during construction	Achieved for all existing projects
Enable communities to lead change at a local level through sustainability and climate action	ESRS S3 Affected Communities - Land related impacts ESRS S4 Consumers & end users - Access to products and services	Community funds are spent on climate action and sustainability	£591,151 in 2024
		Offer community ownership on all new wind farms	Ongoing
Provide community benefits which reflect the priorities of the local community	ESRS S3 Affected Communities - Land related impacts	Track the total spend given to community benefit funds	£1,660,193.60 in 2024
		Track the total spend of grants given from our community funds	£2,117,619.04 in 2024
Support your local community with investment, jobs and skills	ESRS S3 Affected Communities - Land related impacts	We commit to £1million per MW being spent in the local area of all new onshore wind projects	Ongoing target
		We target 65% of the lifetime spend on a windfarm being spent locally	Ongoing target
Deliver reliable, affordable renewable electricity for consumers across the country	ESRS S4 Consumers and end users - Access to products and services	Tracking the energy generation from our projects	653,275 MWh in 2024
		Tracking the percentage of new projects with local energy initiatives embedded into the planning application	100% over the past 2 years

Being a responsible business

Commitment	ESRS topic	Target / metrics to track	Progress
Uphold human rights and promote sustainability in our value chain with transparent reporting	ESRS S2 Workers in the value chain - Forced Labour ESRS E1 Climate change - Climate change mitigation ESRS G1 Business Conduct - Corporate Culture	Target 50% of vendor spend with vendors who have an overarching sustainability policy	Achieved
Maintain robust cybersecurity and data protection across our business	ESRS S4 Consumers and end users - Privacy	Train 100% of employees on cybersecurity annually	Achieved
		Achieve zero security breaches of personal identification information (PII)	Achieved
Advocate for the delivery of a fair, inclusive energy transition which restores nature and tackles climate change	ESRS G1 Business Conduct - Political Engagement ESRS ES - Policy	Track contributions to collaborative policy with trade bodies	Part of the G12/S5 Advisory Group for the Scottish Onshore Wind Sector Deal
		Track number of multi-stakeholder events organised or attended every year	Will be tracked for 2025 report

Thank you.

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