



Code of Conduct

March 2025

drax

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Introduction

A note from our CEO

At Drax, we care about what matters and we're committed to conducting our business with honesty and integrity, and in accordance with all relevant laws and regulations.

In addition, we aim to follow through on our commitments - doing what we say we'll do. This is true of our engagement with colleagues which, for the purposes of this Code of Conduct includes non-permanent workers, suppliers, business partners and other stakeholders. Whether you work for or on behalf of Drax, this Code helps you to do the right thing. It sets out our high-level principles in relation to many important topics and the standards of behaviour we expect from you.

If you're ever concerned that something isn't consistent with our Code, please speak up. You can talk to your line manager, supplier (for non-permanent workers), member of Group Business Ethics, or to me through my [Sli.do](#).

You can also contact our external 'Speak Up' service. I assure you that Drax won't tolerate any negative consequences to you as a result of you seeking advice, raising genuine concerns or reporting misconduct.

Thanks for reading and following our Code of Conduct.

Will Gardiner, CEO



[▶ Watch Will's introduction video to the Code of Conduct by clicking here](#)

About the Code

Our Code of Conduct exists to help everyone at Drax 'do the right thing, always'.

It shows what we expect from our Drax colleagues - both permanent employees and non-permanent workers - and anyone working on behalf of Drax. The Code also helps us to aim for and maintain high standards in everything we do.

This document features a range of individual, subject-specific codes to outline the principles we should all use in our work and in our behaviour. You can find further details in our supporting policies and guidance, where applicable.

If you're unsure what to do or you need assistance, refer to our ethical decision making guide (see page 7) or use the contact details provided in the 'Resources and contacts' section. Please refer to specific policies for relevance to non-permanent workers.

How to use it

We've created this document to provide you, as colleagues, with guidance for 'doing the right thing, always'. It should be referred to, as required, when carrying out your day-to-day work.

You can navigate through the document using the buttons at the top of each page as well as the hyperlinks within the text.

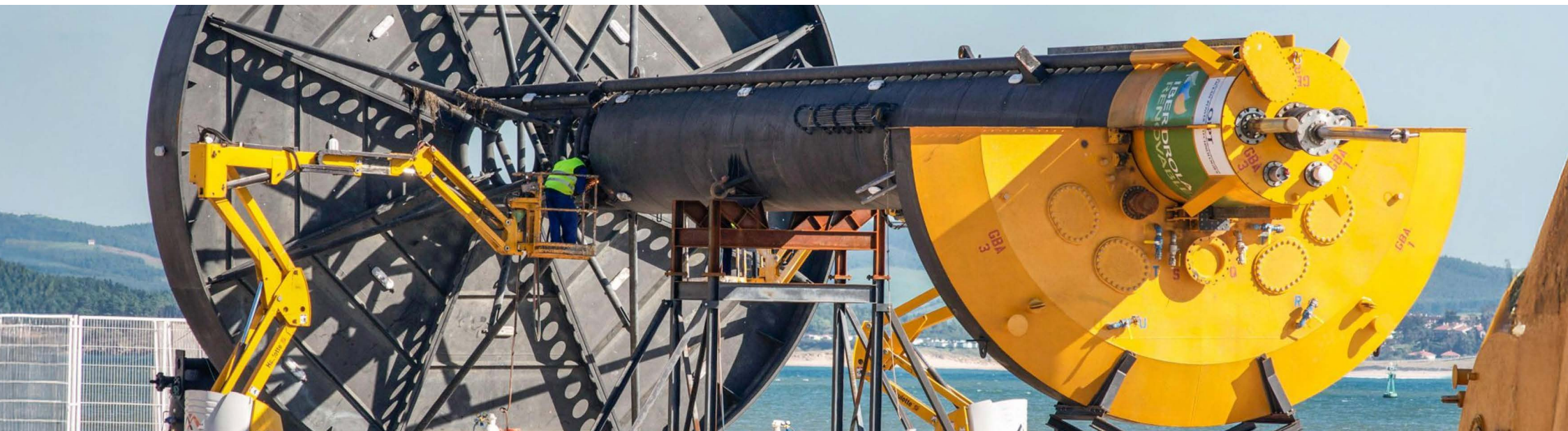
Read the following pages to understand best practice – for when you're not sure what to do in a work-based situation, and for when you feel something isn't right.

On page 9, you can see our Code of Conduct principles in their entirety. This provides a good overview of what we stand for at Drax.

Read the individual sections – which are split into 'People Positive, Climate Positive and Nature Positive' – to get an overview of the subject matter's context, and to understand the standards we expect of you.



For more information and details of relevant tools and who to speak to, head to the Resources and contacts section, by clicking here.



Our purpose

Our purpose is to enable a zero carbon, lower cost energy future.

We'll achieve our purpose through focusing on our strategic aims: being a global leader in sustainable biomass pellets and carbon removals, and a UK leader in dispatchable, renewable generation.

Our heritage, beliefs, purpose and strategic goals form the basis for the way we conduct our business, and for our Code of Conduct.

Our values



Prioritise safety

We all deliver our One Safe Drax vision by caring for ourselves, our assets, our environment and our communities.



Unlock your potential

We see challenge as opportunity and push ourselves to grow. Cultivating an environment where continuous development and holistic wellbeing sit side by side. Operating as one team, we value everyone's differences and unique contributions.



Deliver our promise

We each play an important role in the delivery of our strategy and are driven to give our best every day. Focused on building our reputation through meeting our commitments, we listen to feedback, share ideas and celebrate our collective successes.



Shape the future

We seek out everyday improvements to take steps towards the positive outcomes for our climate, nature and people. No question's too small or challenge too big – we'll find a solution.

Doing the right thing, always

The phrase 'doing the right thing, always' appears several times in the Code of Conduct. In this context, it means acting in a way which positively represents and reinforces our values as Drax and the way we expect to work with business partners.

We've written this Code with 'doing the right thing' in mind. While it provides guidance and examples of common situations you might encounter, it can't cover everything.

If the situation you're facing isn't covered by the Code, use our 'Ethical decision making' guide on page 7.



Our governance

Good governance is integral to the success of our business. It involves effective oversight combined with accountability in following the established laws, regulations, standards and policies applicable to our activities in any territory. At Drax, we call this 'doing the right thing, always'.

Good governance is only effective if all Drax colleagues take personal responsibility. They need to understand how they should act and how 'doing the right thing, always', should inform the decisions they take.

The Board endorses the principles and expected behaviours set out in this Code.

Compliance and mandatory training

Alongside safety, compliance with laws and regulations is critical to the success of our business. It demonstrates our commitment to 'do the right thing, always' and contributes to maintaining our licence to operate.

There are three core principles in our approach to compliance. The first is compliance leadership, ensuring our Board, Executive Committee, operational committees and beyond instil the right tone and promote a compliance mindset. The second is that everyone's responsible for compliance. We must all play an active role in applying critical thinking to the actions we take and decisions we make. The third is to

champion a speak up culture. This empowers colleagues to identify improvement opportunities and raise concerns early.

Colleagues at Drax must complete mandatory compliance training – including the annual Code of Conduct refresher – as part of their role. It's important that all colleagues complete the assigned training in full and within the allocated timeframe.

Alongside training is our policy suite. This provides the knowledge, guidance and support contacts we need to do our roles safely and compliantly. Demonstrating our understanding by completing training and following company policies helps us achieve our strategy and purpose, while protecting our people and business.

Shareholders and other stakeholders

Many of our strategic and investment decisions have multi-year time horizons. We recognise that these decisions can have an impact far beyond our business and well into the future. If we are to meet the needs and expectations of our shareholders and other stakeholders, it is essential that we have good governance, transparent engagement, quality decision making and a strong compliance culture - so we all play an important part, each and every day.



Ethical decision making

The decision guide below is provided to help you choose the right course of action when faced with difficulties.

Your line manager or a colleague in the Group Business Ethics team can also help guide you.

Doing the right thing not only reinforces our values, it helps us comply with laws and regulations and builds positive working relationships with our customers, colleagues and third parties.

Ask yourself



If you answer 'Yes' to all these questions, the decision to move forward is likely to be OK. If you answer 'No' or 'Maybe' to any question, stop the decision-making process and seek guidance before continuing.

What happens if we get it wrong?

There are consequences for you, and for Drax, if you don't follow our Code of Conduct.

As an employee, you might face disciplinary action for serious breaches. This could lead to dismissal and/or legal action (including prison sentences) for both permanent and non-permanent workers.

If Drax is found to be in breach of this Code, it could damage our reputation and adversely affect our working relationships and profits. In some instances, breaches could lead to Drax facing investigations, having to pay financial penalties, and potentially, be banned from providing certain services to our customers.

Non-retaliation

We're committed to having an environment where you can ask questions and raise concerns about business ethics and conduct, without fear that it might have a negative impact on you.

Just like you'd report unethical business or breaches of specific codes, you should report any behaviour towards you that you feel is retaliation. In such situations, contact the Group Business Ethics team or the Whistleblowing Officer (Group Company Secretary).

Speaking up

Principle: We speak up without fear of retaliation when something doesn't feel right.

There may be times when you spot something doesn't seem right – that doesn't follow the Drax Code of Conduct.

In these instances, speak to either:

- Your line manager or another senior leader
- Your supplier (for non-permanent workers)
- A colleague in the Group Business Ethics team
- The Whistleblowing Officer

Alternatively, you can raise it via our external 'Speak Up' service using the details overleaf.

Group Business Ethics team

Group Business Ethics provides support on ethical matters and business conduct. This helps make sure that our decisions match our aim to 'do the right thing, always'.

We recommend that you contact the team for help, support or further information if you feel something's not right.



Web: [Group Business Ethics Sharepoint site](#)

Email: speak.up@drax.com

External 'Speak Up' service

Drax provides access to an external, confidential service that Safecall manages. Use it to raise concerns when you'd prefer not to speak to someone at Drax in the first instance.



Tel: UK +44 (0)8009 151571

Tel: US +1 866 901 3295

Tel: Canada +1-87-75-99-80-73

Tel: Japan +012 0921 067

Web: www.safecall.co.uk/report

The Group Business Ethics team will be able to review the detail of the report (though not the name of the person who reported it, if they chose to remain anonymous) and will arrange investigation, if required.

We treat all reported issues seriously and follow them up conscientiously, discreetly and without bias. We will also assess whether the matter should be reported to the relevant authorities. We would expect to update you on the outcome where this is appropriate and in line with your anonymity preference.

Resources and contacts

For more information, search the documents listed below via the [Group intranet's 'Policies and Guidance' section](#) or PolicyTech.

- Speak Up (whistleblowing) policy
- Speak Up guidance for managers
- Speak Up guidance for colleagues

Relevant tools

[Group Business Ethics SharePoint site](#)

Who to speak to

For help or support, or if you're unhappy with any aspect of the reporting process, speak to a colleague in the [Group Business Ethics team](#).

Alternatively, you can contact Brett Gladden, the Group Company Secretary and Whistleblowing Officer, via brett.gladden@drax.com, who will organise an independent review.

Our principles

People positive

Principle: We speak up without fear of retaliation when something doesn't feel right.

Principle: The safety and wellbeing of our colleagues, contractors and the public is our top priority.

Principle: We're committed to building a fair, safe, and inclusive working environment that better represents the communities in which we operate.

Principle: We take a zero-tolerance approach to bullying, harassment, and discrimination.

Principle: We respect and promote fundamental human and labour rights.

Principle: We are committed to preventing, deterring and detecting fraud, bribery, anti-competition and all other corrupt business practices.

Principle: We protect our people and assets and ensure appropriate protection and handling of data.

Principle: We want everyone to feel like a valued member, on a winning team with a worthwhile mission.

Principle: We seek to partner with our communities to make a positive contribution to their lives and livelihoods.

Principle: We are committed to sourcing materials and services in a manner that minimises climate, environmental and social impact.

Principle: We seek to only work with business partners whose standards are consistent with our own.

Principle: We recognise and respect the rights (including those set out in the UN's Declaration on the Rights of Indigenous Peoples), cultures, and lands of Indigenous Peoples in areas affected by our operations and value chain.

Principle: We seek to adopt processes and systems which enable our reporting to be appropriate and accurate. We expect our colleagues to use these systems and to ensure the information they use is accurate.

Principle: We seek to treat customers fairly.

Principle: We don't abuse our market position.

Principle: We undertake responsible political engagement and advocacy activity, to support the development of policy that underpins our business and sustainability goals.

Principle: We seek to make sure that any information we share is accurate and appropriate; we engage Drax's External Communications team when required.

Climate positive

Principle: We are committed to the UN Global Compact principles and UN Sustainable Development Goals (SDGs).

Principle: Responding to the challenge of climate change is central to our purpose, and ambition to significantly reduce our own carbon emissions alongside the future delivery of carbon removals capacity via our BECCS technology.

Principle: We are committed to ensuring the biomass we use delivers positive outcomes for the climate, nature, and people.

Nature positive

Principle: We will strive to go beyond 'avoiding' or 'minimising' our impacts and find ways to 'restore' and 'enhance' biodiversity and ecosystems.

Principle: We monitor and control emissions of pollutants from our generation and pellet production activities. We take measures to prevent, monitor, and remediate spills that could lead to soil contamination.

Principle: We work to manage water resources used across our operations sustainably. This covers water usage efficiency, wastewater treatment, and measures to protect water quality in nearby rivers and other water bodies, recognising that water is a shared resource for people and the planet.

Principle: We implement circular economy principles to promote resource efficiency, promote reusing and recycling materials and reducing waste within our operations.



People positive

Our people

Safe and healthy workplace

Principle: The safety and wellbeing of our colleagues, contractors and the public is our top priority.

We work together at Drax to make our workplaces safe, healthy, and secure for ourselves, our colleagues, our contractors and visitors, and our communities.

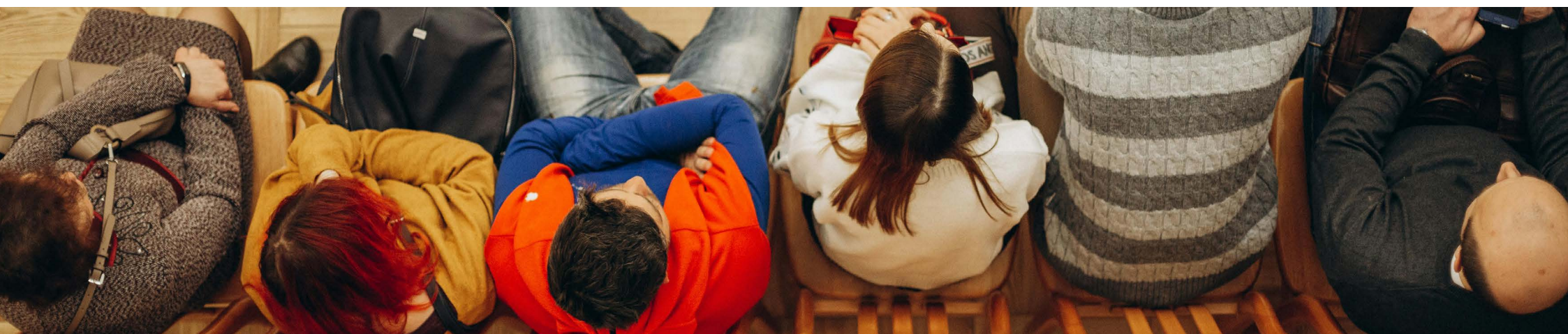
We all need to play a part in keeping our workplaces safe: by looking out for our own safety and that of others; by following our safe working practices; by reporting anything that we believe is, or could be unsafe.

Being under the influence of alcohol and drugs can affect our health, the safety of ourselves and others, and our work performance. We aim to support colleagues with drug or alcohol problems and to keep everyone safe and well.

Our 'My Wellbeing' resources focus on mental, physical, social, and financial wellness. These resources can improve awareness of the tools needed to uplift personal and team resilience. We've also provided helplines and training for managers in supporting wellbeing, to build an organisation that encourages wellness for all colleagues.

What you need to do:

- Avoid putting yourself or others at risk
- Always comply with the Safety Golden Rules (see the 'Resources and contacts' section)
- Stop work if you think it's unsafe
- Be alert to changing safety hazards and processes
- Check our Group Safety, Health and Wellbeing Policy, or speak to your line manager, if you're not sure whether an action or decision is unsafe
- Report anything that's unsafe, any near misses or safety breaches, using our online reporting systems so we can put things right
- Visit 'My Wellbeing' to find tools supporting mental, physical, social and financial wellness



A fair, safe and inclusive Drax

Principle: We're committed to building a fair, safe, and inclusive working environment that better represents the communities in which we operate.

Our commitment to a fair, safe and inclusive Drax, is an essential part of how we empower our colleagues to think differently and contribute to our mission of decarbonising the planet for future generations.

Our fair, safe and inclusive culture means we are working towards ensuring that all colleagues:

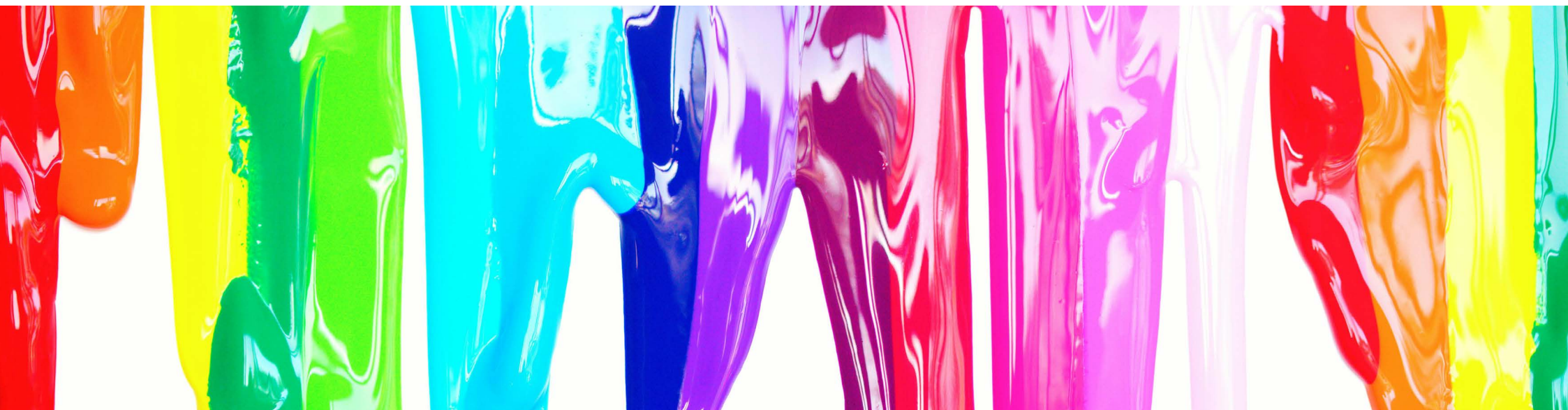
- Are set up to succeed and protected from discrimination
- Have the tools to fully participate in our work at Drax
- Are respected and valued for who they are
- Trust leaders and managers to represent them and our communities

We all play a role in achieving this, ensuring everyone has the tools and opportunities to do their best work and return home safe each day, in both mind and body.

What you need to do

- Embrace difference by seeking to understand and celebrate different cultures and perspectives
- Treat everyone fairly and respectfully, no matter our differences
- When you see something wrong, speak up and take action, whether it's advocating for change or standing against discrimination
- Be open to feedback and challenge respectfully, we all make mistakes, but we all can learn
- Use the processes and resources available to you to ensure you are making fair and consistent decisions and choices

Our Dignity at Work and Diversity, Equity and Inclusion (DEI) Policies provide further information on our commitment and your responsibilities.



Dignity at work

Principle: We take a zero-tolerance approach to bullying, harassment, and discrimination.

We believe that everyone should be treated with dignity and respect. Individuals are different in many ways and we want to embrace and celebrate this diversity.

Equality is the right of different groups of people to not be subjected to discrimination because of their individual characteristics, but to be treated equally and fairly. Some jurisdictions in which we operate have specific legislation related to this, for example, the Equality Act 2010 (in the UK) and the Equality Act of 1974 (in the United States). Both provide a legal framework to protect the rights of individuals and advance equality of opportunity for all.

Under the UK legislation, the protected characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership (in employment only)
- Pregnancy and maternity
- Race (including colour, nationality, ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation

We each have a responsibility to nurture a positive environment, free of bullying and harassment. Think about how your behaviour or language might affect others, or how they may interpret it.

It's important to understand that bullying and harassment can take many forms; what you consider 'friendly banter' may not be perceived in the same way by everyone else. Promoting equality, dignity, and respect results in:

- Fair treatment of people
- Appreciation of our diverse workforce

- Good morale and higher levels of motivation
- Better performance
- A loyal workforce and business stability
- Improved reputation for the organisation as a whole

Conflict resolution

- If there's conflict between colleagues, try to show understanding and resolve things informally in the first instance. However, you can raise a formal complaint if the issue escalates. When a manager becomes aware of a complaint, they'll take action to investigate.
- You shouldn't fear that you'll be victimised for raising a genuine complaint of bullying or harassment, or for assisting in relevant investigations. Retaliation against a colleague for voicing concerns is seen as victimisation and may lead to disciplinary action.
- A formal complaint could lead to disciplinary action.

What you need to do

- Treat colleagues with dignity and respect, and in an inclusive manner
- Think about your comments, or what you might consider to be jokes, before you make them, to avoid being rude or insensitive, or causing offence
- Consider this Code in all your communications, no matter how informal
- Contact your local HR team if you think you are, or a colleague is, being bullied, harassed, or victimised



Remember that we're responsible for our own behaviours at work and whenever we're representing Drax (including on social media). Drax can also be held accountable for the behaviour of its third parties, so raise any relevant concerns you may have with the Group Business Ethics team or via one of our 'Speak up' channels.

Labour rights

Principle: We respect and promote fundamental human and labour rights.

Everyone at Drax, without exception, has the right to equal pay for equal work of equal value. We compensate colleagues competitively, relative to the industry and local labour market. We operate in full compliance with the laws applicable to wages, working hours, overtime, and benefits (including pension and health).

We strictly prohibit the use of all forms of forced and compulsory labour. All employment relationships are voluntary and based on mutual consent, without the threat of penalty or coercion.

Migrant workers working for, or on behalf of, Drax should always have a recognised working relationship and legitimate contract in place within the country of work.

We respect our colleagues' right to join or form a labour union without fear of reprisal, intimidation, or harassment.

We foster a positive and supportive workplace environment that reflects our values, enhances colleague engagement, and promotes collaboration.

Human rights are basic rights that belong to all of us. They're based on important principles like respect, fairness, dignity and equality, as well as the need for protection.

Respecting human rights is fundamental to the sustainability of Drax, our colleagues and the communities in which we operate. We're committed to preventing any abuse of human rights within our business operations and throughout our connected supply chains.

At Drax, we have zero tolerance for modern slavery in any form, including human trafficking. That means we'll work to identify any risk of modern slavery in our own business and supply chains. If we identify any risk, we'll strive to understand the causes and seek to eliminate them.

What you need to do:

- Stay informed about fair pay, labour standards and union rights, and familiarise yourself with our Human Rights policy, Modern Slavery Statements and the Indigenous Peoples policy
- Encourage an inclusive workplace by respecting colleagues of all backgrounds, supporting diversity and as appropriate challenge or raise concerns promptly where you encounter or have concerns about discrimination, harassment or retaliation
- If you're managing employees or non-permanent workers, ensure that each individual has the applicable contract documentation in place within the country of work
- Use the Speak Up channels and/or report any violations of human or labour rights, or any inappropriate behaviour, to Group Business Ethics as soon as you're aware



Business ethics and integrity

Principle: We are committed to preventing, deterring and detecting fraud, bribery, anti-competition and all other corrupt business practices.

Corrupt business practices can seriously damage our reputation, as well as risking financial penalty. To detect and prevent such activities, we have compliance programmes in place and we're all responsible for controlling the risks. We should raise our concerns immediately if we believe improper activity is taking place. Drax will investigate concerns and will respond if we find any evidence of corrupt business practice.

Anti-bribery and corruption

We do not tolerate any bribery or corruption in our business, or in dealings with third parties. This includes any form of facilitation payment. Gifts and hospitality, conflicts of interest and interactions with public officials are areas of risk.

Offering or accepting gifts or hospitality should be clearly in the interests of maintaining genuine business relationships, and be undertaken in accordance with our policies. If this isn't the case, your conduct may constitute bribery or corruption.

A conflict of interest occurs when someone's own interests interfere, or could in the future interfere, with them performing their role properly. You must report all potential conflicts of interest.

Interactions with public officials, particularly where those officials are making decisions which related to Drax, represent risk in relation to actual or perceived bribery. It's prohibited to provide money (or anything else of value) to a public official for the purpose of influencing them in their official capacity.

What you need to do:

- Familiarise yourself with our Anti-Bribery and Corruption policy
- Never promise, offer, pay, invite or accept a bribe – the only exception is if there's a credible threat to your personal wellbeing, health or safety

- Only offer or accept gifts that are appropriate and proportionate – ensure you get the correct level of authorisation
- Record your gifts and hospitality as set out in the Gifts and Hospitality guide
- Avoid (or if they already exist, declare) financial, commercial or other relationships that could conflict with Drax's interests, performance or business operations
- Report potential or actual conflicts of interest as set out in the Conflicts of Interest guide
- When dealing with public officials, seek approval from the Corporate Affairs team before providing accommodation, expenses or hospitality
- Get approval for charitable donations in line with the Community and Charity policy

Financial crime

Criminals can target Drax or use interactions with Drax to seek to make dishonest gains elsewhere. The key risk areas to be aware of are:

Fraud

We must be vigilant to protect Drax against fraud, both by third parties and through dishonest activity of those working for Drax. We must ensure that nobody commits fraudulent acts that benefit Drax, as Drax could then be found guilty of an offence. You must always report fraudulent activity or what you think may constitute the risk of fraudulent activity, so it can be investigated and reported to the appropriate authorities. Please refer to the Anti-Fraud policy.

Tax Evasion

Drax does not tolerate any activity to evade tax within its own business, or its supply chains, and will comply with all relevant tax laws. We will report any suspicion of tax evasion to the appropriate authorities. Please refer to the Corporate Criminal Offences policy.

Financial and trade sanctions

Sanctions take many forms and can have an impact on whole countries, specific sectors, designated entities or individuals. The sanctions most relevant to Drax relate to financial matters and trade, and Drax will always comply with all those that are applicable.

The sanctions that the UK, US, Canada, Japan, European Union (EU) or United Nations (UN) impose are the most relevant. However, colleagues should be aware of any other regimes that may apply to them due to their nationality or their location. Please refer to the Financial and Trade Sanctions policy and the Recusal policy.

What you need to do:

- Familiarise yourself with our suite of financial crime policies (see Resources section)
- Look out for any fraudulent or illegal activity and immediately report any suspicions to Group Business Ethics
- Make sure that any corporate disclosures (i.e. external reporting) you're responsible for are accurate and verified
- Don't make any 'false representations' in statements or reports, or in any of your dealings on behalf of Drax
- Don't abuse a position in which you're expected to safeguard the financial interests of another party or individual
- Comply with all applicable tax laws, and don't knowingly facilitate others to commit tax evasion
- Don't be involved in any way with the concealment, transfer, arrangement, use or possession of criminal property
- Don't be involved in any way with the provision, use, possession or arrangement of funds or property that could be used to contribute to terrorist activity
- Be careful not to violate - or appear to violate - domestic and international sanctions in any commercial activities

Fair competition

We never enter into anti-competitive agreements, abuse our market position, or make improper use of commercially sensitive information. Examples of behaviour that could lead to penalties include (but are not limited to) entering into understandings or agreements to:

- Allocate products, territories, customers or employees
- Bid, not bid, or agree on the content of any proposed bid
- Fix, increase, decrease, stabilise, or standardise prices or production output or capacity
- Not do business with certain companies, customers, distributors or suppliers
- Not solicit a competitor's customers, distributors, suppliers or employees

What you need to do:

- Familiarise yourself with our Fair Competition policy and guide
- Leave any discussion (e.g. at a trade association meeting or social event) where others are engaging in improper discussions and ensure the reason for departure is noted. Merely being present at an inappropriate discussion can be enough for the competition authorities to infer involvement in an anti-competitive agreement
- Refuse all attempts by a competitor, customer or supplier to have an improper discussion, and promptly report the situation to your line manager and to a member of Group Legal
- Don't make formal or informal agreements with competitors that result in price fixing, bid rigging, market allocation or arrangements to limit supply
- Don't share with competitors any commercially sensitive information relating to prices, ongoing bids, terms and conditions of sales, market share, costs or profit margins

Protecting our people and assets

Principle: We protect our people and assets and ensure appropriate protection and handling of data.

Data Protection

We comply with the requirements of relevant data protection laws and respect individuals' privacy rights. These laws require that we make sure individuals can exercise their rights in relation to their own personal information. We maintain policies, processes and systems to safeguard the privacy of individuals and protect their personal information as if it were our own. If personal information is accidentally or deliberately destroyed, lost, altered, disclosed or accessed, we may need to report it to the relevant regulator within a very short timeframe.

We require that any third parties that process personal information on our behalf do the same. We take extra care when processing sensitive information, including racial and ethnic origin, political opinions, religious and philosophical beliefs, a person's sex life or orientation, health information, criminal records and trade union membership.

If our colleagues don't follow the relevant laws, we could be subject to legal proceedings. Breaches of the law could also damage our reputation or commercial interests, and any involved directors could be prosecuted or disqualified from holding office. There could also be personal criminal consequences if colleagues wilfully or recklessly break the law.

What you need to do:

- Respect the rights of individuals whose personal information you process
- Only create, save, process, hold, disclose and transfer personal information in line with our security and data protection policies: 'respect and protect'
- Don't access or disclose personal information to anyone inside or outside Drax, unless in line with both applicable laws and our company policies
- Immediately report a breach to the Data Protection team

Security, Assets, Data Management and Confidentiality

Security is everyone's responsibility. It can affect us all, both in our work and personal lives. Being vigilant and following appropriate practice helps us protect ourselves and Drax. To help protect Drax from threats, we configure our processes, systems, data and assets (e.g. laptops) with security controls to protect valuable technology, intellectual property and commercially sensitive information from unauthorised use and disclosure. Any attempt to reconfigure these measures, unless you're specifically authorised to change them, will be considered a disciplinary matter.

As a Drax colleague or non-permanent worker, you'll have access to business information about Drax, our companies, people, locations, suppliers, customers and business partners. While some of that information will be publicly available, the majority will be confidential and require protection. Protecting confidential information is everyone's responsibility at Drax.

'Confidential information' means any information or material belonging to a member company within the Drax Group or which is in the possession of a member company with the Drax Group. It can also be information that you only know because you're a Drax colleague. Confidential information might be electronic, spoken, appear in writing or any other format.

If you're working on a confidential project, you may be added to a 'Confidentiality List' for that project. As well as preserving the confidentiality of that project, you'll also need to request 'permission to deal' if you want to buy or sell Drax shares during the period you're on the Confidentiality List.

Misuse of Drax confidential information can have serious consequences, so only share it internally and only when absolutely necessary, only disclose confidential information to a third party with appropriate authorisation and use secure communications. Treat confidential information belonging to customers or other third parties in the same way.

What you need to do:

- Read and attest to understanding our Acceptable Use policy and Security policy when joining the business (and annually thereafter)
- Adhere to the content of the Security Framework at all times, so familiarise yourself with the further supporting policies and standards that apply to your day-to-day role – ignorance is not an excuse for a breach!
- Request 'permission to deal' if you wish to deal in Drax shares during any period where you are on a Confidentiality List

Unlocking our potential

Principle: We want everyone to feel like a valued member, on a winning team with a worthwhile mission.

At Drax, we see challenge as opportunity and encourage people to grow, cultivating an environment where continuous development and holistic wellbeing sit side by side.

We encourage our colleagues to take personal ownership of their career growth, seeking out development opportunities and embracing feedback.

We operate as one team and value each other's differences and unique contributions. We foster an environment where everyone feels safe to share their ideas, championing diverse voices and demonstrating transparency in our practices and decision making.

We support all colleagues to achieve their best, fostering a healthy working culture.

What you need to do:

- Be intentional in how you take ownership of your career growth
- Grow your capabilities and skills, and the capabilities of others
- Value difference, operate with kindness and treat colleagues with respect
- Take time to engage and put into practice wellbeing initiatives and habits



Our communities

Community relations and engagement

Principle: We seek to partner with our communities to make a positive contribution to their lives and livelihoods.

Drax has made a long-term commitment to social investment and strategic community engagement in each of the communities where we own and operate an asset.

By 2027, we will deliver bespoke community engagement plans in each of our communities including a collaboration and informed participation processes. This will ensure that our communities are actively involved in the decisions that impact them.

Through the Drax Foundation, we will continue to fund STEM education and green skills training within underserved communities and support improved access to nature and community green spaces. Working with our local Community Advisory Panels, our Community Fund will support local services, non-profits, and community events.

This work helps us to meet the expectations of important stakeholders, and underpins Drax's social licence to operate.

What you need to do:

- Familiarise yourself with our Community & Charity policy
- Consider participating in our North America and UK Charity Committees
- Support the Community team by participating in local community events and outreach activities
- Share our Drax Foundation Annual Review with your local stakeholders



Our supply chain

Responsible sourcing

Principle: We are committed to sourcing materials and services in a manner that minimises climate, environmental and social impact.

This includes responsible sourcing of biomass and non-biomass materials, land use management, and engaging and supporting business partners in a responsible manner.

We advocate for safe, fair, and humane working conditions for all workers within our value chain. We don't tolerate human rights breaches – either within Drax or across our supply chains. Wherever there's an impact upon human rights, we believe it's vital to address, mitigate and correct it.

If we work with an individual or organisation that can't uphold our expected standards, we'll take relevant action.

Progressively, through our procurement processes, we will engage across our value chain to measure and reduce our Scope 3 emissions and increase our use of suppliers that have Science Based Targets or equivalent.

What you need to do (where appropriate to your role):

- Comply with our Biomass Responsible Sourcing policy when sourcing biomass
- Comply with our Global Procurement policy when sourcing non-biomass goods or services
- Comply with our Indigenous Peoples policy

Business partner onboarding and assurance

Principle: We seek to only work with business partners whose standards are consistent with our own.

We want our business partners to uphold similar ethics, values, and standards (to our own), to carry out their business in accordance with applicable laws, rules and regulations, and to comply with our Supplier/Business Partner Code (where relevant).

We should only enter into contracts with such business partners when relevant due diligence has been satisfactorily completed. This may include various types of due diligence (i.e. Procurement, Business Ethics, Data Protection, Information Security, Sustainability, Credit), on the goods and/or services being procured or sold.

We will monitor our business partners during the lifecycle of our commercial arrangements and will take a risk-based approach to assurance.

What you need to do:

- Follow our Ethical Due Diligence Guide to onboard a business partner
- **Drax Procurement/Contract Owners** are responsible for ensuring satisfactory due diligence has been concluded prior to entering, or renewing, any commercial/contractual arrangement with a supplier
- **Drax Customer teams** are responsible for ensuring satisfactory due diligence has been concluded prior to entering, or renewing, any commercial/contractual arrangement with a customer
- Never commit Drax to business or to paying a business partner without ensuring it has been appropriately approved

Rights of Indigenous Peoples

Principle: We recognise and respect the rights (including those set out in the UN's Declaration on the Rights of Indigenous Peoples), cultures, and lands of Indigenous Peoples in areas affected by our operations and value chain.

Indigenous People have a profound relationship with the land on which we operate and from which we source raw materials. We are committed to engaging with those communities to ensure that we respectfully listen to, learn from, understand, and respond to concerns related to our operations.

What you need to do (where appropriate to your role):

- Comply with our Indigenous Peoples policy
- Increase the participation of Indigenous Peoples in our business through direct employment, the procurement of services, and other forms of partnership
- Build positive and sustainable relationships with Indigenous Peoples, based on trust and respect and following free, prior, and informed consent (FPIC)
- Work with our suppliers to develop collaborative and respectful relationships with Indigenous Peoples and local communities, based on the principles of FPIC
- Monitor the impacts of our operations and supply chains through direct dialogue with impacted Indigenous Peoples and local communities



Our external stakeholders

Keeping accurate records

Principle: We seek to adopt processes and systems which enable our reporting to be appropriate and accurate, we expect our colleagues to use these systems and to ensure the information they use is accurate.

We aim to keep our financial and other records complete, accurate and filed safely. These records include:

- Contracts
- Payroll
- Expense reports
- Emails
- Accounting and financial data
- Measurement and performance records
- Electronic data files

We're all responsible for recording company information accurately and for retaining and disposing of company records according to our policies. In this way, we can help to:

- Protect Drax resources
- Meet the expectations of customers, investors and suppliers
- Make sure information is accessible for as long as it's needed

Falsifying Drax records in any way – or destroying, altering or withholding them outside our Data Retention, Destruction and Archive Standard – is a serious offence and may result in prosecution. If you think there's an inaccuracy in our books, reports or invoices, or a weakness in our accounting systems, report it to the team which manages those reports and processes. Alternatively, raise it via one of our 'Speak up' channels (see page 8).

Even unintentional mistakes in our financial records, reports, invoices – or anything else that affects our external reporting – could be against the law. So, it is important everyone is vigilant to supporting compliance and in recording and ensuring the accuracy of data.

What you need to do

- Record all expenditure and transactions, or any other aspect of Drax business, accurately and on time
- Claim expenses and book business travel and accommodation in line with the Travel and Expense policy; ask if you're unsure
- Take extra care to be accurate when making – or storing – business or statutory records
- Preserve business documents and records in accordance with our Records Retention and Destruction Standard
- Don't do anything that would compromise the accuracy or integrity of our business records, reports, products or services



Report inaccuracies in our records that are outside of your control to the team which manages those reports and processes, or via one of our 'Speak up' channels (see page 8)

Treating customers fairly

Principle: We seek to treat customers fairly.

We seek to treat customers fairly in all interactions. We're committed to treating our customers fairly and being honest, transparent, appropriate and professional in all our interactions with them but we recognise that even with good intentions, issues can arise and so we have a clear complaints procedure if things go wrong.

We make sure that:

- The information we provide is clear, accurate and easy to understand
- We aim to give our customers the best possible service
- We strive to deliver great service to our customers, so they're more likely to stay with us and recommend us to others
- We strive to make sure that we conduct our customer marketing activities fairly and lawfully and that we respect their preferences

What you need to do

- Be open, honest and transparent
- Provide clear, complete and accurate information
- Engage with customers about products and services relevant to them, and respect their marketing preferences
- Make it easy for customers to contact us, and respond promptly when they do
- Swiftly put things right if they go wrong
- Communicate clearly and simply
- Be consistent in doing what we say we'll do
- Enable a fair outcome for the customer
- Respect the privacy of our customers' personal information, and make sure it's protected



Market abuse

Principle: We don't abuse our market position.

Market abuse is behaviour that affects the integrity of financial markets and/or wholesale energy markets and prevents market transparency.

The regulations about market abuse protect investors, and we support the regulations by safeguarding against market abuse. Attempting to affect markets by abusing inside information (see definitions below), or attempting to manipulate markets by knowingly spreading false information, are serious offences.

Drax securities

Drax securities can take the form of equities (ownership via stocks and shares) or debt instruments (money borrowed and due for repayment).

They're dealt in ways that include:

- The purchase, sale or transfer of shares
- The exercise of share options
- Entering into contracts for difference or equity swaps

As Drax securities are publicly traded, colleagues dealing in them must comply with the strict rules that prevent market abuse. Anyone in possession of 'inside information' can't deal in, or recommend that another person deals in, Drax securities. Dealing when in possession of inside information is both a civil and criminal offence.

We define 'inside' information relevant to securities as information that:

- Is of a precise nature
- Is not generally available (so you only know it because you're a Drax colleague)
- Relates, directly or indirectly, to Drax or any Drax securities
- Would, if generally available, be likely to affect the price of Drax securities

Examples might include:

- Major business developments, like substantial projects
- Regulatory developments
- Dividend announcements
- Significant changes in expectations of our performance
- Changes to our Board of Directors
- Major contracts awarded

Only authorised people should access and disclose inside information relating to Drax. If you believe you may be in possession of inside information, or are unsure, contact the Group Company Secretary immediately. Colleagues may face disciplinary proceedings (and consultants/contractors may be in breach of their contract with Drax) if they abuse inside information, and may also face civil or criminal proceedings.



Wholesale energy market

The Drax Generation business buys and sells power on the wholesale energy markets. Drax as a company, and individual colleagues, must comply with strict rules that prevent market manipulation. Adhering to these rules avoids Drax entering into regulated products relating to energy and treasury contracts when it is, or its colleagues are, in possession of inside information.

We define 'inside information' relevant to the wholesale energy market as information that:

- Is of a precise nature
- Is not available
- Relates, directly or indirectly, to Drax, any other market participant or any wholesale energy product
- Would, if generally available, be likely to have a significant effect on the price of wholesale energy products

What you need to do

- Don't deal – or recommend that anyone else deals – in any Drax securities if you're in possession of inside information
- Don't deal in the securities of other companies if you've come into possession of relevant inside information through your work
- Don't share any confidential information about Drax (including any inside information) except where you're required to do so as part of your employment/engagement
- Read and understand the Drax Dealing Code, and comply with its guidance if you wish to deal in Drax securities
- Read and understand the Regulation on Energy Market Integrity and Transparency (UK REMIT) Policy, and comply with its guidance if you're involved in:
 - Transacting in wholesale gas or electricity and associated derivatives
 - Declaring inside information relating to Drax units to the public



Contact the Group Company Secretary (Drax securities) or the Wholesale Market Compliance team immediately:

- If you come into possession of inside information
- For advice before dealing if you intend to enter a transaction



Political engagement and lobbying

Principle: We undertake responsible political engagement and advocacy activity, to support the development of policy that underpins our business and sustainability goals.

Political decisions, particularly those that affect energy and environmental policies, have the potential to impact upon Drax. We have an interest in ensuring that decision-making is well informed and seeks to ensure an appropriate balance of the potentially competing priorities. Engagement is undertaken by Drax in order to listen to the concerns of our stakeholders and take them into account during our decision-making processes as well as provide information that will help others to better understand Drax.

Drax makes no political donations, we engage with politicians, political parties, policymakers, and other stakeholders to understand their views and explain our plans and strategy.

We have robust oversight and detailed policies to guide our political engagement activities and support colleagues in understanding how they can achieve compliance. We undertake activity which we can demonstrate is legitimate and proportionate.

What you need to do:

- Don't undertake any political engagement or lobbying without approval from Corporate Affairs
- Don't undertake any political engagement or lobbying without checking the local requirements for registration and record keeping, then keep full records
- Don't offer anything (e.g. gifts, hospitality, travel support) to a political stakeholder without first determining if it's permissible under the laws and regulations of the relevant jurisdiction
- Don't make company funds or assets, including work time, available to any political party or political candidate (although employees may have time away from work to vote in elections pursuant to applicable law)
- Don't seek to influence the outcome of any electoral campaigns, or contribute funding to any political campaign, in your capacity or role as an employee, agent, officer, or contractor of Drax
- Don't make any direct or indirect charitable or political donations or sponsorships to political parties, organisations or individuals engaged in politics for the purpose of obtaining an advantage in business transactions, or to encourage those in political office to refrain from performing their duty
- Always comply with our Political Engagement and Lobbying policy, Anti-bribery and Corruption policy and Ethical Due Diligence guidance



Media and communications

Principle: We seek to make sure that information we share is accurate and appropriate; we engage with the Drax External Affairs team when required.

Our reputation at Drax is incredibly important to us. We build, protect and maintain it by making sure we behave in a manner that reflects positively on the Drax brand.

What appears in news coverage and social media, as well as what we say and do, has the potential to influence our reputation. Engagement with stakeholders including those which are engaged in media is therefore important as part of enabling them to understand our business.

The External Affairs team is responsible for managing relevant policy and external relationships, and for communicating via our websites and on social media on behalf of Drax. If you are approached on such matters and asked for comment, please, in the first instance, contact the Media team without making comment or responding.

Drax recognises that colleagues may wish to use their devices and communication channels to publish material on the internet and social media. You should do this in a manner that's consistent with both your contract of employment and our Acceptable Use policy.

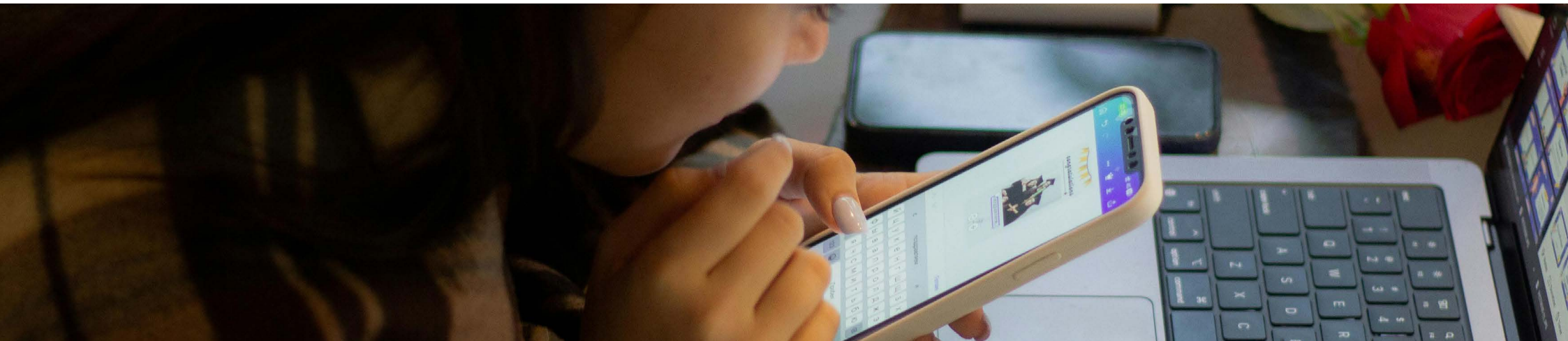
If you have a complaint to make about a colleague or workplace matter, don't communicate it via social media. Instead, raise it in line with your local grievance procedure or according to the processes described in 'Speaking up' (page 8).

Please note that we encourage colleagues to promote social media content from Drax

(e.g. by sharing its Twitter, Facebook, LinkedIn and Instagram posts). When doing so, please follow the social media guidance in our Acceptable Use policy.

What you need to do

- Always act in a way that protects or enhances the Drax brand and our reputation
- Use care and good judgement when speaking about Drax or our people, including when outside of work
- Don't use social media to post or display information about Drax and its stakeholders that's vulgar, obscene, threatening, intimidating, harassing, libellous or discriminatory
- Get authorisation from the Media team before speaking to the news media about Drax business activities
- Get authorisation from the Investor Relations team and/or the Group Company Secretary before speaking to members of the investment community about Drax business activities
- Keep confidential all sensitive information about Drax
- Ensure that all information communicated externally is correct and verified
- Get authorisation from the Investor Relations team and/or the Group Company Secretary before speaking to members of the investment community about Drax business activities
- Keep confidential all sensitive information about Drax





Climate positive

Our climate action

Our commitment to the UN Global Compact and UN Sustainable Development Goals (SDGs)

Principle: We are committed to the UN Global Compact principles and UN Sustainable Development Goals.

We are a participant of the UNGC, which is a voluntary corporate sustainability initiative that encourages businesses worldwide to adopt sustainable and socially responsible practices.

Our Sustainable Development Framework is designed to ensure our business model and commercial transition produces positive outcomes for climate, nature, and people, in our value chains and the locations in which we operate.

We support the principles of the UN Global Compact and align the objectives of our business with the UN Sustainable Development Goals (SDGs). We have prioritised eight intersecting SDGs where we have the greatest impact.



What you need to do:

- Support our UNGC participation and commitment by considering the SDGs and our specific objectives when undertaking your work
- Overall adherence with this Code will directly support compliance the broad range of SDGs
- Be aware of the SDGs when performing any third-party due diligence
- Find out more at <https://unglobalcompact.org/>

Climate change action

Principle: Responding to the challenge of climate change is central to our purpose, and ambition to significantly reduce our own carbon emissions alongside the future delivery of carbon removals capacity via our BECCS technology.

We align ourselves with science and are committed to further reducing our emissions as far as possible across the footprint of the business.

We address the physical and transition risks and opportunities of climate change through mitigation and adaptation. Mitigation reduces Scope 1, 2 and 3 emissions; adaptation involves adjusting our operations to reduce vulnerability and enhance resilience.

We advocate for climate action through participation in relevant industry initiatives, and by engaging with our supply chain partners (both upstream and downstream), regulatory bodies, and national governments.

What you need to do:

- Comply with the Climate policy
- Remain vigilant for opportunities to reduce emissions across our operational footprint and within our supply chain
- Follow our risk governance model for climate-related risks (see Drax Principle Risk Disclosures)

Sustainable biomass supply chain

Principle: We are committed to ensuring the biomass we use delivers positive outcomes for the climate, nature, and people.

Sustainably sourced forest biomass is at the heart of our purpose: Enabling a zero carbon, lower cost energy future. We will continue to develop and apply policies and processes to ensure we source all our biomass to verified standards for sustainability.

We work with Indigenous Peoples, NGOs and non-profits to understand the social and economic impacts and benefits where we source our biomass.

We will keep our sourcing guidelines under review by following the latest science and continually developing best practices.

What you need to do (where applicable to your role):

- Comply with the Sustainable Biomass Sourcing policies
- Comply with all other aspects of Drax sourcing and procurement requirements such as ethics, modern slavery, etc
- Ensure audits and periodic checks are done for all biomass sourcing to ensure compliance with Drax standards and certification and regulations
- Work with Indigenous Peoples and communities in areas we source biomass from for positive impacts
- Ensure full transparency of our biomass sourcing





Nature
positive

Our environmental impact

Biodiversity and ecosystems

Principle: We strive to go beyond 'avoiding' or 'minimising' our impacts and find ways to 'restore' and 'enhance' biodiversity and ecosystems.

Nature, including biodiversity and ecosystems plays a foundational role in maintaining the health, productivity, and stability of the many natural systems, and societies cannot survive, let alone thrive, without the natural world's ecosystem services. However, scientists' assessment of nature is bleak and the call to action to safeguard the natural world urgent: wildlife populations have declined 73% in the past 50 years according to the WWF.

At Drax, being "nature positive" means going beyond avoiding or minimising our impacts. We seek to preserve and restore biodiversity and ecosystems in the areas we operate, and the regions from which we source.

What you need to do:

- Recognise the importance of nature in your business activities
- Minimise impacts on nature and look for ways to contribute to nature restoration and for opportunities to partner with stakeholders working on nature conservation

Air and soil pollution

Principle: We monitor and control emissions of pollutants from our generation and pellet production activities. We take measures to prevent, monitor, and remediate spills that could lead to soil contamination.

This is subject to UK, US and Canadian laws. Compliance is overseen internally by our Operational and HSE teams and externally by the local regulatory agencies.

Our operations are required to comply with the laws and regulations on emissions and substances to protect human health and the environment.

What you need to do:

- Be aware of and comply with the relevant regulations. Preventative measures should be in place to prevent pollution, and in the event of an incident, effective remediation undertaken promptly
- Always look for ways to continuously improve our performance, including learning from any near miss events



Water management

Principle: We work to manage water resources used across our operations sustainably. This covers water usage efficiency, waste water treatment, and measures to protect water quality in nearby rivers and other water bodies, recognising that water is a shared resource for people and the planet.

The use of water is subject to strict criteria and UK, US and Canadian laws. Compliance is overseen internally by our Operational and HSE teams and externally by the local regulatory agencies.

What you need to do:

- Be aware of and comply with the relevant regulations
- Recognise that water is a shared resource and be aware of other water users such as communities and the importance of water as habitat for wildlife
- Look for opportunities to improve water efficiency

Circular economy and waste

Principle: We implement circular economy principles to promote resource efficiency, promote reusing and recycling materials and reducing waste within our operations.

A circular economy promotes the circulation of materials, reducing resource use and identifying ways to eliminate waste. This way of thinking also has positive impacts for addressing climate change, tackling pollution and supporting nature restoration.

What you need to do:

- Seek opportunities to reduce resource use, identify where materials can be reused or recycled, and reduce waste generation





Resources and contacts

Code	More information	Relevant tools	Who to speak to
Safe and healthy workplace	- Health and Safety Policy - Drug and Alcohol Policies (local) - Wellbeing Policy Statement	SAI360	"For help or support about health and safety guidance and best practice, speak to a local Health and Safety colleague or the Group HSE Director. For help or support with wellbeing, speak to your manager or a local HR colleague, or call the relevant helpline: - Employee Assistance Programme helpline (UK) – 0800 316 9337 - Life Assistance Program helpline (US) – 800-538-3543 - Employee Assistance Program (Canada) - 1-866-814-0018 (access code - DRX0123)
A fair, safe and inclusive Drax	Diversity, Equity and Inclusion Policy	Search 'Diversity' in the 'One Drax playlist' for additional eLearning	Drax is committed to providing a safe, supportive and inclusive working environment for all our colleagues. However, if you experience or witness discrimination, harassment, or bullying, and can't resolve it yourself, talk to your manager, HR or contact our confidential Speak Up service. Anonymous reports are accepted, but providing your name helps us resolve issues more effectively. Investigations will be independent, impartial, fair, and proportionate.
Dignity at work	Dignity at Work Policy	- People First Help Centre - DE&I SharePoint	For help or support, speak to a colleague in your local HR team or call the relevant helpline: - Employee Assistance Programme helpline (UK) – 0800 316 9337 - Life Assistance Program helpline (US) – 800-538-3543 - Employee Assistance Program (Canada) - 1-866-814-0018 (access code - DRX0123)

Code	More information	Relevant tools	Who to speak to
Labour rights	• Human Rights policy • Dignity at Work policy • Diversity, Equity and Inclusion policy • Indigenous Peoples policy • Drax Modern Slavery Statements (Drax.com)	• Group Business Ethics Share Point site	For help or support, speak to a colleague in the Business Ethics Group team or your local HR team, use the external Speak Up service, or call the relevant helpline: • Employee Assistance Programme helpline (UK) – 0800 316 9337 • Life Assistance Program helpline (US) – 800-538-3543 • Employee Assistance Program (Canada) - 1-866-814-0018 (access code - DRX0123) For guidance on UK-based modern slavery concerns, call the Modern Slavery Helpline on 0800 0121 700.
Business ethics and integrity	• Anti-bribery and Corruption policy • Anti-fraud policy • Fair Competition policy • Corporate Criminal Offences policy • Financial and Trade Sanctions policy • Recusal policy • Community and Charity policy • Political Engagement and Lobbying policy • Gifts and Hospitality guide • Conflicts of Interest guide • Ethical Due Diligence guide • Fair Competition guide • Third Party Privacy Onboarding policy	• Self-Service Portal • Business Ethics SharePoint site • Privacy SharePoint site	For general help and support, contact a colleague in the Business Ethics Group team. To report suspicions of financial crime contact the Group Company Secretary or use one of our other 'Speaking up' channels. For help or support on Fair Competition matters, speak to (rather than email) a colleague in the Legal or Business Ethics teams, or contact the external Speak Up service.



Code	More information	Relevant tools	Who to speak to
Protecting our assets, data and resources	• Security policy (and wider Security Framework) • Acceptable Use policy • Privacy policy • Privacy guide • Personal Data Breach policy • Third Party Privacy Onboarding policy • Colleague Data Handling policy • Crime Data and Special Category Personal Data policy	• Security SharePoint • Privacy SharePoint • Self-Service Portal	For support setting up personal devices, contact your local IT service desk via the Self-Service Portal. For help or more information on an information security related matter, speak to a colleague in the Security team. For help or support on a data protection related matter, speak to a colleague in the Data Protection team.
Unlocking our potential	• People Development policy	• OneDrax	For help or support, speak to a colleague in the People Development team
Community relations and engagement	• Community and Charity policy	• Community and Charity SharePoint	For help or support, speak to a colleague in the Community team
Responsible sourcing	• Biomass Responsible Sourcing policy • Global Procurement policy • Indigenous Peoples policy • Human Rights policy • Ethical Due Diligence guide	• Finance and Procurement SharePoint • Business Ethics Sharepoint	For help or support, speak to a colleague in the Procurement, Business Ethics Group or Sustainability team
Business partner onboarding and assurance	• Biomass Responsible Sourcing policy • Global Procurement policy • Human Rights policy • Indigenous Peoples policy • Ethical Due Diligence guide	• Self Service Portal (UK) D365 (North America) • Finance and Procurement SharePoint • Business Ethics SharePoint	For help or support, speak to a colleague in the Procurement, Business Ethics Group or Sustainability team

Code	More information	Relevant tools	Who to speak to
Keeping accurate records	• Travel and Expenses policy (Group) • Japan Guidelines for Travel and Expenses • UK Guidelines for Travel and Expenses • Anti-fraud policy • Data Retention, Destruction and Archive standard • Personal Data Record Retention and Destruction policy	• Security SharePoint • Privacy SharePoint • Self-Service Portal • HR systems	For help or support, speak to a colleague in the Data Protection, Business Ethics Group, Group Tax or Group Finance teams. Report concerns via one of our 'Speaking up' channels.
Treating customers fairly	• Drax Energy Solutions Standards of Conduct policy • Opus Energy Standards of Conduct policy • Privacy policy • Customers Privacy notice • Crime Data and Special Category Personal Data policy	• Privacy SharePoint • Self Service Portal	For help or support, speak to a colleague in the Consumer Compliance (including Data Protection) team.
Political engagement and lobbying	• Political Engagement and Lobbying policy • Anti-bribery and Corruption policy • Ethical Due Diligence guide		For help or support, speak to a colleague in the External Affairs team.
Media and communications	• Market Abuse (Drax shares) - Disclosure and Information • Management policy • Acceptable Use Policy	• Company Secretarial (CoSec) SharePoint site	For help or support about Market Abuse contact the Group Company Secretary. For general help or support, speak to a colleague in the Media team

Code	More information	Relevant tools	Who to speak to
Our commitment to the UN Global Compact SDGS		UN Global Compact Website	For help or support, speak to a colleague in the Sustainability team
Climate change action	- Climate policy [Carbon Capture and Storage policy]	Drax.com	For help or support, speak to a colleague in the Sustainability team
Sustainable biomass supply chain	- Biomass Responsible Sourcing policy - Indigenous Peoples policy	Drax.com	For help or support, speak to a colleague in the Sustainability team

Code	More information	Relevant tools	Who to speak to
Biodiversity and ecosystems	- Environment policy - Nature policy	Drax.com	For help or support, speak to a colleague in the Sustainability team
Air and soil pollution	Nature policy	Drax.com	For help or support, speak to a colleague in the Sustainability team
Water management chain	Nature policy	Drax.com	For help or support, speak to a colleague in the Sustainability team
Circular economy and waste	Nature policy	Drax.com	For help or support, speak to a colleague in the Sustainability team

