

Drax Smart Supply Holdco Limited

Companies Act, Section 172 statement

The Directors have a duty to promote the success of the Company, having regard to a range of matters and stakeholders. The Board is responsible for ensuring effective engagement with stakeholders and recognises that decisions taken today will have an impact upon stakeholders, as well as shape the longer-term performance of the business. Appropriate consideration is important in enabling Drax to deliver positive outcomes for the climate, nature and people, and to deliver sustainable value creation.

Examples of how the Board have had regard to the matters set out in Section 172 to the extent relevant to the Company are set out below. Comprehensive details in respect of stakeholders identified across the Drax Group plc group (the “Group”) and how we engage with them and have regard to their interests, can be found from page 96 to 102 in the Drax Group plc 2024 Annual Report and Accounts.

The likely consequences of any decision in the long term

Our purpose is to enable a zero carbon, lower cost energy future. With multi-year time horizons for many of our strategic and investment decisions, we recognise that these decisions can have an impact far beyond our business and well into the future. We see an important role in supporting the decarbonisation of British Industrial and Commercial (“I&C”) businesses through the supply of renewable energy, asset optimisation, Electric Vehicle services and carbon offset certificates, which we believe could evolve in the future to the provision of carbon removal certificates.

The interests of the Company’s workforce

Engaging with our colleagues is a priority and starts with listening to, and better understanding, their views. Our workforce engagement forums (“My Voice Forums”) are a valuable way for the Board and senior management to undertake such engagement. The My Voice Forums are made up of colleague members from each part of our business, to ensure representation for every function. They provide us with a view of colleague sentiment and key topics that are on colleagues’ minds. A member of the senior leadership team and an HR representative support these forums and attend each meeting. The My Voice Forum chairs meet with the Chair and CEO of the Group to discuss colleague sentiment and to provide feedback on key topics. Each of these meetings features a discussion about the feedback on topics previously agreed to be important to the workforce. Topics discussed in 2024 included colleague communications, colleague recognition and transformational change.

In 2024, we began the transition towards shorter, more frequent colleague engagement surveys to support the implementation of our listening strategy. From 2025, our My Voice Surveys have become quarterly, providing more regular engagement insights for managers and leaders. For the first time, in 2024, colleagues were also given access to their personal survey results, allowing them to track their own engagement journeys. In addition, we worked on responding to our key actions from 2023 through our Wellbeing, Diversity, Equity and Inclusion and Community strategies.

We also maintain regular dialogue with our workforce through our colleague briefings, weekly updates from the Group CEO with a question-and-answer section responding to colleague questions, our engagement surveys, and communication about the Group’s strategy, plans and performance. During 2024, communications included updates about progress against the Group-wide scorecard, which includes KPIs in

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relation to financial, strategic, safety, compliance and sustainability performance. Annual bonuses for colleagues are linked to the scorecard performance, ensuring that employee reward and Group performance are aligned. We actively encourage participation in the Group-wide all-employee Sharesave scheme, offering the maximum discount of 20% and waiving any length of service requirements.

The need to foster the Company's business relationships

Our relationships with relevant suppliers are governed by contracts that include compliance with relevant regulatory and legal requirements such as anti-bribery, corruption and modern slavery rules. Suppliers are also expected to adhere to our supplier code of conduct. The Company also monitors prompt payment performance to identify where we can improve to help maintain positive supplier relationships.

The desirability of the Company for maintaining a reputation for high standards of business conduct

At Drax, we are committed to conducting business ethically, with honesty and integrity. We do not condone any behaviour that could give rise to concerns or the perception of bribery or corruption.

The need to act fairly between members of the Company

Our ultimate parent company is Drax Group plc and therefore we act in the best interests of our immediate and ultimate parent companies and, in doing so, in the best interest of the investors and shareholders of the Group. This ensures that the interests of all relevant stakeholders, and the need to act fairly between members of the Company, are considered during decision-making.

This statement was approved by the Board on 1 July 2025 as part of the Company's 2024 Annual Report and Accounts.