

SMW 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 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. Our decisions support the Group’s long-term strategy: to be a global leader in sustainable biomass pellets; to be a global leader in carbon removals; and to be a leader in UK dispatchable, renewable generation.

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 BECCS, 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 relation to financial, strategic, safety, compliance and sustainability performance. Annual bonuses for

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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

Suppliers

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 required to adhere to our supplier code of conduct. These are regularly reviewed by our Procurement, Legal, and Business Ethics functions and Drax also monitors prompt payment performance to help improve payment performance and maintain positive supplier relationships.

Regulators and network operators

Engagement with Ofgem, DESNZ, and the National Energy System Operator allows us to promote the delivery of a secure, reliable energy system offering best value for consumers. Engagement with Ofgem, environmental agencies and the ICO enables us to promote best practice and ensure we remain compliant with latest guidance.

The impact of the Company's operations on the community and the environment

Tackling climate change is an important part of our purpose, and our strategic objectives are aligned to global renewable energy and decarbonisation agendas. Our Group ambition is to reach net zero across our value chain by 2040. For more information see pages 38 to 43 in the Drax Group plc 2024 Annual Report and Accounts.

We believe strong community relationships and effective engagement strengthen our ability to operate effectively. We engage regularly with communities through supporting local initiatives and holding drop-in sessions. To read more about our positive social impact across the Group, see pages 96 to 102 in the Drax Group plc 2024 Annual Report and Accounts.

Drax is committed to being a good neighbour in the communities where we operate. We achieve this by combining active community engagement with corporate giving. Throughout 2024, the Drax Foundation has continued to provide grant funding for non-profit organisations that share our commitment to improving equitable access to STEM education, community green spaces, and renewable energy. We prioritise projects and programmes that support underrepresented and underserved groups.

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.

Our Business Ethics compliance framework identifies the behaviours expected from colleagues on a broad range of topics. In 2024, we furthered our efforts to promote awareness of and trust in our Speak Up culture and methods of reporting, through internal communications to all business areas at all locations using a variety of channels including news stories, emails, posters, digital screens, virtual presentations and in-person events. We also strengthened our approach to the avoidance of bribery and corruption through updated mandatory

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eLearning for all colleagues. For more details on how the Business Ethics programme is managed, see page 53 of the Drax Group plc 2024 Annual Report and Accounts.

The need to act fairly as 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.

Engagement with shareholders of the Group allows us to understand the concerns and priorities of current and prospective investors, in areas such as climate change; sustainability; executive pay; dividends; longer-term capital allocation policy; and strategy, which are taken into account in our decision making.

This statement was approved by the Board on 26 June 2025 as part of the Company's 2024 Annual Report and Accounts.