

Drax Group plc

ESG Performance Report 2025

drax

Our mission is to help meet the world's increasing demand for secure energy, sustainably. For us, sustainability isn't about words, it's about action – to benefit the climate, nature, and people.

What's inside

Environment

- 4 Generation, Pellet Production and Energy Solutions
- 5 Carbon and energy
- 7 Nature and environmental management

Social

- 9 Our people
- 10 Health and safety
- 10 Social value

Governance

- 11 Ethics and integrity

Statements

- 12 Directors' Statement
- 13 PricewaterhouseCoopers LLP (PwC) Independent Assurance Statement
- 19 Bureau Veritas UK Limited Independent Assurance Report

➤ Policies and key documents are available at www.drax.com/about-us/corporate-governance/compliance-and-policies/

Introduction

Our mission is to help meet the world's increasing demand for secure energy, sustainably. For us, sustainability isn't about words, it's about action – to benefit the climate, nature, and people.

Ross McKenzie

Chief Corporate Affairs and Sustainability Officer

We recognise the important role we play in shaping a more sustainable future. The environmental, social, and economic challenges facing society today are complex and urgent but they also present opportunities for transformation. Businesses must lead from the front, and we are fully committed to doing just that.

In 2025, we took meaningful steps to embed sustainability more deeply into our business, strategy, and purpose:

- we launched our Sustainability Framework, setting out the milestones ahead and strengthening transparency across our plans, processes, and operations;
- we voluntarily published our inaugural Climate Transition Plan, outlining our climate ambitions, targets, and pathways to delivery, as well as our contribution to the sector-wide transition to net zero. This significantly expanded the climate-related information we make publicly available; and
- we also published our Biomass Sourcing Policy, which sets out the core principles and sustainability commitments that apply to all biomass in our supply chain. Supported by external certification schemes, our internal assurance systems, and independent third-party audits, it demonstrates how we ensure our biomass is sourced in line with relevant legislation.

Throughout the year, we continued to make progress against our Science Based Targets initiative (SBTi) commitments. We saw improved ratings across selected ESG benchmarks, and our inclusion on CDP's A List for climate change and forests – recognition that reinforces our position as a responsible and transparent operator. These achievements reflect the dedication of our teams and the integration of sustainability into our strategic decision-making.

Yet we remain responsive to the challenges ahead. The evolving global and regional regulatory landscape, particularly around biomass sustainability, carbon accounting, and climate disclosures, demands agility and continued investment. We continue to face scrutiny from investors, NGOs, and communities who rightly expect transparency, accountability, and evidence of impact.

We are committed to addressing these challenges with transparency and resolve. Our approach includes ongoing dialogue with stakeholders, continuous monitoring, evaluation and improvement of our framework and commitments.

One such stakeholder group is our Independent Advisory Board (IAB), established in 2019 to provide independent scientific challenge, insight, and advice on biomass sustainability across our business. The IAB focuses on the science underpinning each pillar of our Sustainability Framework, climate, nature, and people positive, and provides robust oversight of the biomass sustainability practices that support these pillars.

Our priority for the year ahead is to continue delivering against the Sustainability Framework and to accelerate progress towards the commitments and targets it sets out. This means embedding our principles across every part of the organisation, driving measurable improvements, and ensuring our actions remain aligned with long-term climate, nature, and people positive outcomes. By maintaining focus and accountability, we aim to demonstrate tangible progress and reinforce our leadership in sustainable business.

In February 2026, Chief Sustainability Officer, Miguel Veiga-Pestana, formally transitioned leadership to Ross McKenzie. The passion and commitment to sustainability across Drax has continued to be one of our core strengths, and Miguel's leadership and dedication have been instrumental in bringing the company to this point. The Group looks forward with optimism as Drax continues to build momentum and deliver positive impacts for climate, nature, and people.

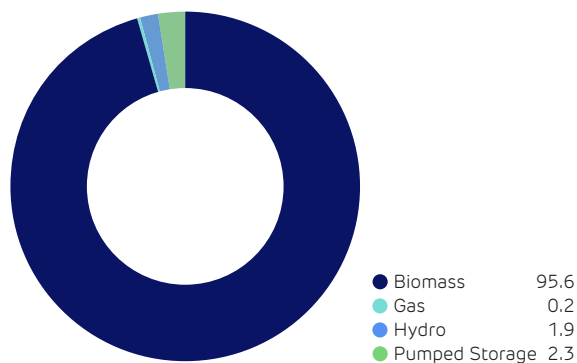
In this document, we present the environmental, social, and governance (ESG) metrics for Drax Group plc for the year ended 31 December 2025, including details of third-party assurance obtained where applicable. For further information on the progress of our sustainability journey, including actions taken towards the commitments set out in our Sustainability Framework, please refer to the Sustainable development section within our 2025 Annual Report and Accounts.

Generation, Pellet Production and Energy Solutions

	Unit	2025	2024	Notes
Generation output				
Total generation output	TWh	16.07	15.8	Generation output has been captured from Unit Export. Unit Export is the sum of gross generation less self-generated works power.
Total renewable generation output	TWh	16.04	15.8	Includes biomass, hydro and pumped storage.
Total non-renewable generation output	TWh	0.03	0.0	Includes an Open-Cycle Gas Turbine, which was not under operational control of Drax in 2025.
Proportion of renewable generation output	%	99.8	100	
Generation capacity				
Total generation capacity	GW	3.5	3.2	Capacity at 31 December for reporting year.
Total renewable generation capacity	GW	3.1	3.1	Includes biomass, hydro and pumped storage.
Total non-renewable generation capacity	GW	0.4	0.1	The non-renewable capacity represents gas-fired start-up capacity at Drax Power Station and a newly constructed Open-Cycle Gas Turbine, which was not under operational control of Drax in 2025.
Pellet Production				
Total wood pellets produced	Mt	4.2	4.0	
Energy Solutions				
Total electricity sales	TWh	12.8	16.0	
Total gas sales	TWh	0	0.4	
Electricity supplied to customers from renewable sources	%	93	91	The figures relate to Compliance Period 23 (April-March). Please see more on our websites at: https://energy.drax.com/support/fuel-mix-disclosure .

Power generation mix in 2025

(% total output)



Carbon and energy

	Unit	2025	2024	Notes
Carbon emissions, Scope 1 and 2				
Generation CO ₂ e emissions	ktCO ₂ e	213	207	Generation emissions covers the total direct emissions from Scope 1 and indirect emissions from Scope 2 (location-based) activities across our Generation sites.
Group total Scope 1	ktCO ₂ e	301[Ⓐ]	266	Group total Scope 1 covers all direct emissions from our own business operations, across all sites.
Group total Scope 2 (location-based)	ktCO ₂ e	256[Ⓐ]	280	Group total Scope 2 covers all indirect emissions associated with our electricity and heat consumption, across all sites. Since 2023 we have updated the location-based methodology, where the Group is able to apply our own generation (currently UK REGOs) and apply a zero-carbon factor for GB grid locations.
Group total Scope 2 (market-based)	ktCO ₂ e	372[Ⓐ]	367	
Group total Scope 1 and 2 (location-based)	ktCO ₂ e	557	546	
Proportion of Group emissions within the UK	%	43[Ⓐ]	43	
Direct biogenic CO ₂ emissions	ktCO ₂ e	14,085	13,932	The biogenic CO ₂ emissions, associated with direct combustion, across the Group are zero-rated under the GHG Protocol methodology and our SBTi targets. Biogenic CO ₂ emissions are reported separately as "outside of scope" in ESG reports or under "Memo items" of UK Emissions Trading Scheme (UK ETS).
Generation emissions per GWh of electricity generation	tCO ₂ e/GWh	13[Ⓐ]	13	
Group emissions per GWh of electricity generation	tCO ₂ e/GWh	35[Ⓐ]	35	Group emissions are total Scope 1 and 2 (location-based) emissions as reported.
Carbon emissions, Scope 3				
Group total Scope 3	ktCO ₂ e	1,504[Ⓐ]	1,808	
<i>Purchased goods and services</i>	ktCO ₂ e	120	230	An updated spend-based methodology has been used in 2025, and a rebaseline undertaken to more accurately calculate emissions within this category. See Basis of Reporting for more details. Emissions have reduced in both of these categories resulting from a significant reduction in spend, with fewer capital projects.
<i>Capital goods</i>	ktCO ₂ e	61	119	
<i>Fuel and energy-related activities</i>	ktCO ₂ e	1,141	1,249	Movement due to reductions in traded electricity and biomass supply chain emissions.
<i>Upstream transportation and distribution</i>	ktCO ₂ e	118	124	A review of this category has reallocated emissions from Downstream Transportation and Distribution to Upstream Transportation and Distribution, which has been applied to all years' data. The emissions across Transportation and Distribution as a whole have increased slightly due to an increase in shipped pellets.
<i>Waste generated in operations</i>	ktCO ₂ e	4	5	
<i>Business travel</i>	ktCO ₂ e	3	5	

Carbon and energy continued

	Unit	2025	2024	Notes
Carbon emissions, Scope 3 (continued)				
<i>Employee commuting</i>	ktCO ₂ e	5	4	
<i>Upstream leased assets</i>	ktCO ₂ e	0	0	2025 underlying value of 38 tCO ₂ e (2024: 292 tCO ₂ e) rounds to 0 at the reported precision.
<i>Downstream transportation and distribution</i>	ktCO ₂ e	33	17	A review of this category has reallocated emissions from Downstream Transportation and Distribution to Upstream Transportation and Distribution, which has been applied to all years' data, where data has been available. The emissions across Transportation & Distribution as a whole have increased due to an increase in shipped pellets.
<i>Processing of sold products</i>	ktCO ₂ e	1	0	2024 underlying value of 476 tCO ₂ e rounds to 0 at the reported precision.
<i>Use of sold products</i>	ktCO ₂ e	18	53	The scaling down and eventual sale of the Opus Energy gas accounts has resulted in the reduction in year-on-year emissions.
<i>Downstream leased assets</i>	ktCO ₂ e	0	0	2025 underlying value of 59 tCO ₂ e (2024: 50 tCO ₂ e) rounds to 0 at the reported precision.
Energy consumption				
Group total energy consumption	GWh	42,356[Ⓐ]	41,521	
Group total energy consumption within the UK	GWh	38,370	38,294	

[Ⓐ] This metric was subject to external independent limited assurance by PricewaterhouseCoopers LLP (PwC) as part of their assurance over metrics in the ESG Performance Report 2025. For the results of that assurance, refer to page 13 in the ESG Performance Report 2025.

Some of the 2024 equivalent metrics have been restated following the completion of re-baseline in 2025. For further details, see the Basis of Reporting.

Nature and environmental management

Other emissions to air

	Unit	2025	2024	Notes
Power Generation, other emissions to air				
Nitrogen oxides – Generation	t	6,751	6,853	
Sulphur dioxide – Generation	t	627	887	
Particulates – Generation	t	523	468	
Sulphur hexafluoride – Generation	t	0.01	0.01	
Pellet Production, other emissions to air				
Nitrogen oxides – Pellet Production	t	738	783	
Volatile Organic Compounds (VOCs) – Pellet Production	t	894	919	
Particulates – Pellet Production	t	752	766	
Carbon monoxide – Pellet Production	t	1,491	1,485	

Water

	Unit	2025	2024	Notes
Water withdrawn/abstracted from areas of water stress	m ³	0	0	Total volume of water from areas of “high” water stress, as classified by the WRI Aqueduct Water Risk Atlas (Aqueduct 4.0), baseline “water stress” indicator.
Water consumed from areas of water stress	m ³	482	248	This metric considers water use across direct operations of Drax and sites classified in areas of baseline (current) “high water stress”. The volume reported represents water use at our London office. A second site (BMM Energy facility) was also identified, however was deemed immaterial due to low volume of staff and associated water use.
Total water abstracted – Drax Power Station	m ³	44,857,626	44,491,595	
Total water returned – Drax Power Station	m ³	39,856,691	37,119,036	
Total water abstracted and returned – Galloway and Lanark Hydro Scheme	m ³	3,203,741,860	3,664,202,383	
Total water abstracted from reservoir – Cruachan Power Station	m ³	410,378,315	519,698,714	
Total water abstracted from Loch Awe – Cruachan Power Station	m ³	383,318,628	509,603,586	Excluding volume of water collected via the aqueduct system.

Environmental management and compliance

	Unit	2025	Notes
Total land owned	km ²	26.3	Total spatial footprint is the sum of land owned, leased and/or managed by the group on 31 December 2025.
Total nature-related fines	£	0	We considered environment-related fines, penalties, litigation awards and settlements as “nature-related fines”. There have been no environmental fines or penalties levied and no litigation awards or settlements paid in 2025 for nature-related impacts.

Nature and environmental management continued

Biomass

	Unit	2025	2024	Notes
Proportion of woody biomass consumed at Drax Power Station with SBP Compliant claim	%	99.95 ⁽¹⁾	98.62 ⁽²⁾	
Proportion of woody biomass pellets produced and sold with an SBP Compliant claim – Pellet Production	%	96.96	96.48	Reported figure reflects pellets produced and sold with an SBP Compliant claim. The remaining volume was produced and sold with an SBP Controlled claim.
Average biomass supply chain GHG emissions	kgCO ₂ e MWh	87.09 ⁽¹⁾	93.66 ⁽²⁾	

(1) Limited external assurance by Bureau Veritas using the assurance standard ISAE 3000. For assurance statement see www.drax.com/sustainability.

(2) Limited external assurance was obtained over this metric in prior year and the corresponding assurance statement can be found at www.drax.com/sustainability.

Drax Group sources of fibre

Country	Sawmill and other wood industry residues (t)	Branches and tops (t)	Thinnings (t)	Low-grade roundwood (t)	Salvage trees* (t)	Non-woody biomass** (t)	Country total (t)
US	2,672,716	116,112	1,096,284	1,819,805	10,586	161,562	5,877,065
Canada	2,404,616	212,023	-	207,181	9,777	-	2,833,597
Latvia	111,997	16,212	9	734,816	-	-	863,034
Estonia	-	320	10,155	48,621	-	-	59,096
UK	-	-	-	-	-	48,847	48,847
Portugal	735	24	21,082	9,128	213	-	31,182
Lithuania	9,395	-	-	7,997	-	-	17,392
Brazil	360	-	-	-	4,967	-	5,327
Other European	2,122	-	-	750	-	-	2,872
Total	5,201,941	344,691	1,127,530	2,828,298	25,543	210,409	9,738,412

Drax Power Station sources of fibre (material used at Drax Power Station)

Country	Sawmill and other wood industry residues (t)	Branches and tops (t)	Thinnings (t)	Low-grade roundwood (t)	Salvage trees* (t)	Non-woody biomass** (t)	Country total (t)
US	2,608,195	116,112	1,096,284	1,819,805	10,586	161,562	5,812,544
Canada	737,790	74,562	-	77,222	9,777	-	899,351
Latvia	111,997	16,212	9	734,816	-	-	863,034
Estonia	-	320	10,155	48,621	-	-	59,096
UK	-	-	-	-	-	48,847	48,847
Portugal	735	24	21,082	9,128	213	-	31,182
Lithuania	9,395	-	-	7,997	-	-	17,392
Brazil	360	-	-	-	4,967	-	5,327
Other European	2,122	-	-	750	-	-	2,872
Total	3,470,594	207,230	1,127,530	2,698,339	25,543	210,409	7,739,645 ⁽¹⁾

The above tables display tonnages of finished wood pellet equivalents. The volume of fibre sourced from Canada for use at Drax Power Station increased year on year, reflecting higher operational activity during the period. This overall increase was driven primarily by greater procurement of third-party pellets from Eastern Canada, which offset a reduction in fibre sourced from Drax's own Canadian operation.

(1) This total was subject to external independent limited assurance by Bureau Veritas UK Limited.

* In 2025 SBP published standards v.2.0 within which SBP differentiated Salvage Trees and End-of-life Trees. Prior to this standard change both categories were combined and referred to as End-of-life Trees. For Annual Reporting 2025 Drax has reflected this change. Biomass consumed by DPS covering this Annual Report only contains Salvage Trees.

** Following a review of terminology, the category previously titled Agricultural Residues has been renamed in the 2025 Annual Report to Non-woody biomass in order to more closely reflect RO Sustainability Criteria.

Our people

	Unit	2025	2024	Notes
Workforce composition				
Total Group employees	n	2,974	3,243	Total number of Group employees as at 31 December for reporting year.
Total pay and benefits (50th percentile)	£	78,831	75,409	
Ratio of CEO earnings	n:1	34:1	38:1	
Diversity, Equity and Inclusion				
Group employees – Female	%	28.45	28.5	Total workforce, including Board members and senior managers.
Group employees – Male	%	71.55	71.5	
Board members – Female	%	37.5	44.4	Senior Management is defined as Executive Committee, direct reports (excluding Personal Assistants and Executive Assistants) and Subsidiary Directors.
Board members – Male	%	62.5	56.6	
Senior managers – Female	%	33.9	35.7	
Senior managers – Male	%	66.1	64.3	
Middle managers – Female	%	40.6	39.6	Middle Management is defined as 2nd and 3rd line reports to the Executive Committee.
Middle managers – Male	%	59.4	60.4	
People of Colour in senior management	%	8.1	5.7	People of Colour is defined as an umbrella term for non-white racial groups, including Black, Asian, Latino, and Indigenous populations.
People of Colour in middle management	%	8.6	8.2	
Not declared in senior management	%	16.1	17.1	Colleagues in the UK & Canada are not legally required to share their racial or ethnic heritage with us, this represents those who have not disclosed this information.
Not declared in middle management	%	25.2	25.7	
Age range 16-24 in senior management	%	0	0	
Age range 25-44 in senior management	%	25.8	22.9	
Age range 45-64 in senior management	%	69.4	74.3	
Age range 65+ in senior management	%	4.8	2.9	
Age range 16-24 in middle management	%	0.7	1.3	
Age range 25-44 in middle management	%	53	55	
Age range 45-64 in middle management	%	45.1	41.8	
Age range 65+ in middle management	%	1.2	1.9	
Workforce – other				
Employees covered by collective bargaining agreement	%	11.7	10.7	
Employee engagement score	n	7.2	7.4	In 2024, we transitioned engagement survey providers and score calculation methodology.
Employee turnover rate	%	19.2	21.6	Total employee turnover is calculated as the number of leavers over the previous 12 months and divided by the average headcount over the same period.
Voluntary employee turnover rate	%	7.6	7.8	Voluntary employee turnover is based on leaver categorisation, including resignation and retirement.
Involuntary employee turnover rate	%	11.6	13.8	Involuntary employee turnover is based on leaver categorisation, including dismissal and redundancy.

Health and safety

	Unit	2025	2024	Notes
Health and safety				
Total Recordable Incident Rate (TRIR)	Per 100,000 hours	0.33[Ⓐ]	0.24	TRIR is the total fatalities (2025: 0), lost time injuries, restricted work, and medical treatment injuries per 100,000 hours worked. Total includes incidents and hours of both employees and contractors across our sites and offices.
Near Miss and Hazard Identification Rate (NMHIR)	Per 100,000 hours	208.96[Ⓐ]	167.56	NMHIR is the total near misses and hazard incidents per 100,000 hours worked. Total includes both employees and contractors. The calculation methodology has been updated in 2025 to include employee overtime hours. See Basis of Reporting for more details.
Fatalities	n	0	0	Total includes both employees and contractors.

[Ⓐ] This metric was subject to external independent limited assurance by PricewaterhouseCoopers LLP (PwC) as part of their assurance over metrics in the ESG Performance Report 2025. For the results of that assurance, refer to page 13 in the ESG Performance Report 2025.

Social value

	Unit	2025	2024	Notes
Social value				
Total Donations (including Drax Foundation)	£	3,112,455	3,618,132	
Funding by Country				
Drax Foundation – Total funding to UK	£	1,647,262	2,378,190	
Drax Foundation – Total funding to Canada	£	529,247	267,222	
Drax Foundation – Total funding to US	£	536,764	265,835	
Funding by Focus Area				
Drax Foundation – Total funding to STEM initiatives	£	743,521	521,338	
Drax Foundation – Total funding to energy efficiency and fuel poverty initiatives	£	1,262,161	2,122,778	
Drax Foundation – Total funding to nature and community green spaces initiatives	£	687,590	262,130	
Drax Community Fund – Total funding for our operating communities	£	399,182	695,347	Donations to local non-profit organisations and community groups in the communities where Drax operates.

Ethics and integrity

	Unit	2025	2024	Notes
Speak Up (whistleblowing)				
Total number of Speak Up reports raised	n	69	49	We investigate all reports where sufficient information is provided. 69 reports were raised through our Speak Up channels during 2025 and all were resolved and closed in 2025. 21 could not be progressed due to insufficient information; 40 were investigated and found to be unsubstantiated; 8 were investigated and found to be substantiated resulting in appropriate action being taken.
eLearning and training				
Employees that have received and completed an Annual Business Ethics Declaration	%	99.8	99.6	Calculated as the proportion of permanent employees who have completed an Annual Business Ethics Declaration, as of 31 January 2025, relative to the number invited to complete. Excludes employees on long-term absence from Drax during the declaration period.
Employees that have received and completed the Code of Conduct eLearning refresh	%	99.2	99.6	Calculated as the proportion of permanent employees who have completed the Code of Conduct eLearning refresh, as of 31 January 2025, relative to the number invited to complete. Excludes employees on long-term absence from Drax.
Cyber security				
Employees that received and completed Cyber Security Awareness training	%	97.8	99.6	

Directors' Statement

Directors' Statement on Drax Group plc's ESG Performance Data⁽¹⁾

The following statements are made by senior management with delegated authority from the Board of Drax Group plc.

As the Senior Management of Drax Group plc ("Drax") we confirm that we are solely responsible for the preparation of ESG Performance Report 2025 including this Directors' Statement and for reporting the selected ESG Performance Data⁽¹⁾ in accordance with the reporting criteria set out in the following weblink: www.drax.com/esg-databook-2025 and ensuring that the reported information is supported by appropriate books and records. We confirm, to the best of our knowledge and belief, that we have:

- designed, implemented and maintained internal controls and processes over information relevant to the measurement, evaluation and preparation of ESG Performance Data⁽¹⁾ that is free from material misstatement, whether due to fraud or error;
- established objective reporting criteria that is appropriate for preparing and presenting the ESG Performance Data⁽¹⁾, including clear definition of the entity's organisational boundaries, and applied them consistently;
- presented information, including the reporting criteria, in a manner that provides relevant, complete, reliable, unbiased/neutral, comparable and understandable information; and
- reported the ESG Performance Data⁽¹⁾ in accordance with the reporting criteria.



Chief Corporate Affairs and Sustainability Officer

For and on behalf of the Board of directors of Drax Group plc

25 February 2026

(1) "ESG Performance Data" is made up of the following:

- Group total Scope 1 greenhouse gas emissions;
- Group total Scope 2 (location and market-based) greenhouse gas emissions;
- Group total Scope 3 greenhouse gas emissions;
- Proportion of Group emissions in the UK;
- Generation emissions per GWh of electricity generation;
- Group emissions per GWh of electricity generation;
- Group total energy consumption;
- Total Recordable Incident Rate; and
- Near Miss and Hazard Identification Rate



PricewaterhouseCoopers LLP (PwC) Independent Assurance Statement



Independent Limited Assurance Report to the Directors of Drax Group plc on ESG Performance Data

Our limited assurance conclusion

Based on the procedures we have performed, as described under the "Summary of work performed" and the "Areas of Assurance Focus" sections below, and the evidence we have obtained, nothing has come to our attention that causes us to believe that the information marked with the symbol [®] in Drax Group plc's ("Drax") ESG Performance Report 2025 for the year ended 31 December 2025 (the "Report") and summarised below (together, the "Subject Matter Information"), has not been prepared, in all material respects, in accordance with the "Environmental, Social and Governance (ESG) Sustainability Basis of Reporting" document (the "Reporting Criteria") set out in the following link: <https://www.drax.com/esg-databook-2025>.

What we were engaged to assure

The Subject Matter Information needs to be read and understood together with the Reporting Criteria which Drax's directors are solely responsible for selecting and applying. The Subject Matter Information and the Reporting Criteria are as set out in the table.

Subject Matter Information	Location of Subject Matter Information	Reporting Criteria
- Group Total Scope 1	- Page 5 of the Report	The Reporting Criteria is available on Drax's website https://www.drax.com/esg-databook-2025 ⁽¹⁾
- Group Total Scope 2 (location-based)	- Page 5 of the Report	
- Group Total Scope 2 (market-based)	- Page 5 of the Report	
- Group Total Scope 3	- Page 5 of the Report	
- Proportion of Group emissions within the UK	- Page 5 of the Report	
- Generation emissions per GWh of electricity generation	- Page 5 of the Report	
- Group emissions per GWh of electricity generation	- Page 5 of the Report	
- Group total energy consumption	- Page 6 of the Report	
- Total Recordable Incident Rate (TRIR)	- Page 10 of the Report	
- Near Miss and Hazard Identification Rate (NMHIR)	- Page 10 of the Report	

(1) The maintenance and integrity of the Drax website is the responsibility of the Directors; the work carried out by us does not involve consideration of these matters and, accordingly, we accept no responsibility for any changes that may have occurred to the reported Subject Matter Information or Reporting Criteria when presented on the Drax website.

PricewaterhouseCoopers LLP (PwC) Independent Assurance Statement continued

The scope of our work did not extend to information in respect of earlier periods or to any other information included in, or linked from, the Report.

Our work

Professional standards applied

We performed a limited assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised) 'Assurance Engagements other than Audits or Reviews of Historical Financial Information' and, in respect of the greenhouse gas (GHG) emissions, in accordance with International Standard on Assurance Engagements 3410 'Assurance Engagements on Greenhouse Gas Statements', issued by the International Auditing and Assurance Standards Board.

Our independence and quality control

We have complied with the Institute of Chartered Accountants in England and Wales Code of Ethics, which includes independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour, that are at least as demanding as the applicable provisions of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code).

We apply International Standard on Quality Management (UK) 1 and accordingly maintain a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Summary of work performed

We performed a limited assurance engagement. Because the level of assurance obtained in a limited assurance can vary, we give more detail about the procedures performed, so that the intended users of the Subject Matter Information can understand the nature, timing and extent of procedures we performed as context for our conclusion. These procedures performed vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

In performing our assurance procedures, which were based on our professional judgement, we performed the following:

- evaluated the suitability in the circumstances of Drax's use of the Reporting Criteria as the basis for preparing the Subject Matter Information including the associated reporting boundaries;
- through inquiries, obtained an understanding of Drax's control environment, processes and systems relevant to the preparation of the Subject Matter Information. Our procedures did not include evaluating the suitability of design, obtaining evidence about their implementation or testing operating effectiveness of particular control activities;
- evaluated whether Drax's methods for developing estimates are appropriate and had been consistently applied, noting that our procedures did not involve testing the data on which the estimates are based or separately developing our own estimates against which to evaluate Drax's estimates;
- compared year on year movements and obtained explanations from management for significant differences we identified;
- performed limited substantive testing of the Subject Matter Information, which is aggregated from information submitted by Drax's operations. Testing involved agreeing arithmetical accuracy of calculations, and agreeing data points to or from source information to check that the underlying subject matter had been appropriately evaluated or measured, recorded, collated and reported;
- undertook site visits at Drax Power Station to understand the operations within the electricity generation processes; and
- evaluated the disclosures in, and overall presentation of, the Subject Matter Information.

Our assurance procedures specifically did not include testing to source evidence the accuracy of average biomass supply chain emissions, which are assured separately and for which Drax has obtained an ISAE 3000 (R) limited assurance report.

Materiality

We are required to plan and perform our work to address the areas where we have identified that a material misstatement of the Subject Matter Information is likely to arise. We set certain quantitative thresholds for materiality. These, together with qualitative considerations, helped us to determine the nature, timing and extent of our procedures in support of our conclusion. We believe that it is important that the intended users have the

information they need to understand the concept and the level of materiality to place our conclusion in context. Based on our professional judgement, we determined materiality for the Subject Matter Information as follows:

Overall materiality

Materiality may differ depending upon the nature of the Subject Matter Information. We apply professional judgement to consider the most appropriate materiality benchmark for each aspect of the Subject Matter Information, having considered how the intended users may use the information.

For each metric, materiality has been set at 5% of the total reported figure.

This threshold means that a misstatement of 5% in the reported figure, of either an individual misstatement, or as an aggregate of smaller misstatements, would lead us to conclude that the Subject Matter Information had not been prepared in all material respects in accordance with the Reporting Criteria.

When the metric is a percentage, any misstatement in either the numerator or denominator has been considered simultaneously in order to identify if the movement in the reported figure is larger than 5%. For example, where the metric reported is 50% a material misstatement would be 5% of 50% in this case a percentage point movement of 2.5%, as a result any misstatement which moved the percentage point above 52.5% or below 47.5% would be considered material.

We also agreed to report to the Directors misstatements ("reportable misstatements") identified during our work at a level below overall materiality, as well as misstatements below that lower level that in our view warranted reporting for qualitative reasons. The Directors are responsible for deciding whether adjustments should be made to the Subject Matter Information in respect of those items.

PricewaterhouseCoopers LLP (PwC) Independent Assurance Statement continued

Areas of Assurance Focus

The Areas of Assurance Focus are those areas of our work that, in our professional judgement, require additional procedures. In the case of limited assurance, that means our procedures may be towards the upper end of those that might be expected for limited assurance. These areas were identified as part of our risk assessment and result of the assurance procedures performed, and include those areas of significant risk, areas that involved significant judgement or other areas where significant assurance effort was needed. This approach provides transparency about where we deemed it necessary to perform extra work. However, this does not imply – for limited assurance – the same level of assurance as would have been obtained under a reasonable assurance engagement.

We considered the following areas to be Areas of Assurance Focus and discussed these with Drax’s management.

Scope 3 supply chain

<p>Nature of the issue</p>	<p>A significant proportion of Drax Scope 3 emissions comes from the Biomass Pellets supply chain. Drax uses actual data from a number of upstream suppliers, to calculate greenhouse gas emissions associated with the biomass supply chain.</p> <p>The calculation of the emissions is calculated using Drax’s bespoke “Biomass Carbon Calculator”. In previous engagement cycles it has been noted this calculation is complex and incorporates a high number of varied inputs and emission factors from across the supply chain and as a result has been identified as an area to focus testing on within Scope 3 supply chain emissions.</p>
<p>How our work addressed the areas of assurance focus</p>	<p>The engagement team has validated the appropriateness of the Scope 3 boundary against GHG protocol Scope 3 guidance.</p> <p>To consider the appropriateness of the calculation used to calculate the “emissions from the Biomass Pellets” the engagement team has:</p> <ul style="list-style-type: none"> – Obtained an understanding of each step of the calculation through discussions with management. – Agreed applied emission factors to recognised third party sources. – For a selected number of pellet supplier calculations, traced Drax inputs into the calculator to third party SBP Audit Report (SAR). – For a selected number of pellet supplier calculations, performed an end-to-end check of the calculations within the Drax’s Biomass Carbon Calculator, inspecting the arithmetical accuracy of the calculations as well as validating the calculation methodology against the Reporting Criteria.
<p>Element(s) of the Subject Matter Information most significantly impacted</p>	<p>Group total Scope 3 greenhouse gas emissions to 31 December 2025.</p>

PricewaterhouseCoopers LLP (PwC) Independent Assurance Statement continued

Contractor hours	
Nature of the issue	<p>Contractor hours is an input into total hours which is used in the denominator of both "Total Recordable Incident Rate" (TRIR) and "Near Miss and Hazard Incident Rate" (NMHIR) metrics.</p> <p>In previous engagement cycles the total contractor hours figure was calculated from 8 different Business Units, each of which had a different individual who was responsible for the contractor hours. Each Business Unit has different sites, and a number of the sites also calculated or collated evidence of contractor hours in a different manner (e.g. sign in sheets, clock in clock out systems, internal diaries or external confirmations).</p> <p>During FY25 the approach to collating the contractor hours has been made consistent by Drax across the Business Units, generating a more comparable calculation and audit trail across Business Units.</p>
How our work addressed the areas of assurance focus	<ul style="list-style-type: none"> - Obtained an understanding of the updated data collection and reporting processes used across each Business Unit; - Performed a reconciliation of each Business Unit's total contractor hours to supporting listings; and - Sample tested, back to supporting documentation, hours from the two Business Units (Capital Projects and DPS) which make the highest use of contractors.
Element(s) of the Subject Matter Information most significantly impacted	<p>Total Recordable Incident Rate for year ended 31 December 2025.</p> <p>Near Miss and Hazard Identification Rate for year ended 31 December 2025.</p>

Change in methodology for Scope 3 – Category 1: Purchased Goods and Services and Category 2: Capital Goods	
Nature of the issue	<p>The methodology applied to calculate Category 1: Purchased Goods and Services and Category 2: Capital Goods within Scope 3 greenhouse gas emissions has changed in FY25:</p> <ul style="list-style-type: none"> - Operating ("Opex") and Capital ("Capex") Expenditure has been categorised on a granular spend type. Each spend type has a different emissions factor applied based on the nature of the spend. - Emissions factors applied to spend have been updated with a new up to date emissions factor set. <p>Historical emissions have been re-baselined with the change in methodology.</p>
How our work addressed the areas of assurance focus	<ul style="list-style-type: none"> - Obtained an understanding of the updated methodology and calculation applied to Opex and Capex data; - Considered the appropriateness of the source of the new emissions factors applied; - For a sample of Opex and Capex transactions, obtained supporting documentation to assess the categorisation of spend type; - For a sample of Opex and Capex transactions, obtained evidence to support the emissions factor applied for each category of spend; - Recalculated emissions based on audited Group Opex and Capex costs.
Element(s) of the Subject Matter Information most significantly impacted	<p>Group total Scope 3 greenhouse gas emissions to 31 December 2025.</p>

PricewaterhouseCoopers LLP (PwC) Independent Assurance Statement continued

Challenges of non-financial information

The absence of a significant body of established practice upon which to draw to evaluate and measure non-financial information allows for different, but acceptable, evaluation and measurement techniques that can affect comparability between entities, and over time.

Non-financial information is subject to more inherent limitations than financial information, given the characteristics of the underlying subject matter and the methods used for measuring or evaluating it. The precision of different measurement techniques may also vary.

In particular:

- The number of recorded incidents that are included within both "Total recordable incident rate" and "Near miss hazard identification rate" are reliant on employees and contractors reporting incidents in line with documented policy when they have been subject to an incident, near miss or hazard; and
- The total number of hours worked by Drax employees and contractors, which is part of the denominator in both the "Total recordable incident rate" and "Near miss hazard identification rate" is reliant on employees recording their absences within Drax's workforce management system and contractors recording the number of hours they spent providing their services to Drax.

Reporting on Other Information

The other information comprises all of the information in the Report other than the Subject Matter Information and our assurance report. The Directors are responsible for the other information. As explained above, our conclusion does not extend to the other information and, accordingly, we do not express any form of assurance thereon. In connection with our assurance of the Subject Matter Information, our responsibility is to read the other information. In doing so, we consider whether the other information is materially inconsistent with the Subject Matter Information or our knowledge obtained during the assurance engagement, or otherwise appears to contain a material misstatement of fact. If we identify an apparent material inconsistency or material misstatement of fact, we are required to perform procedures to conclude whether there is a material misstatement of the Subject Matter Information or a material misstatement of the other information, and to take appropriate actions in the circumstances.

Responsibilities of the Directors

As explained in the Directors' Statement on page 12 of the Report, the Directors of Drax are responsible for:

- determining appropriate reporting topics and selecting or establishing suitable criteria for measuring or evaluating the underlying subject matter;
- ensuring that those criteria are relevant and appropriate to Drax and the intended users of the Report;
- the preparation of the Subject Matter Information in accordance with the Reporting Criteria including designing, implementing and maintaining systems, processes and internal controls over the evaluation or measurement of the underlying subject matter to result in Subject Matter Information that is free from material misstatement, whether due to fraud or error;
- documenting and retaining underlying data and records to support the Subject Matter Information;
- producing the Report that provides a balanced reflection of Drax's performance in this area and discloses, with supporting rationale, matters relevant to the intended users of the Report; and
- producing a statement of Directors' responsibility.

Our responsibilities

We are responsible for:

- planning and performing the engagement to obtain limited assurance about whether the Subject Matter Information is free from material misstatement, whether due to fraud or error;
- forming an independent conclusion, based on the procedures we have performed and the evidence we have obtained; and
- reporting our conclusion to the Directors of Drax.

Use of our report

Our report, including our conclusion, has been prepared solely for the Directors of Drax in accordance with the agreement between us dated 27 August 2025 (the "agreement"). To the fullest extent permitted by law, we do not accept or assume responsibility or liability to anyone other than the Board of Directors and Drax for our work or our report except where terms are expressly agreed between us in writing.

PricewaterhouseCoopers LLP

PricewaterhouseCoopers LLP
Chartered Accountants
Leeds

25 February 2026

Bureau Veritas UK Limited Independent Assurance Report



To: The Stakeholders of Drax Group plc

1. Introduction and Objectives of Work

Bureau Veritas UK Limited (Bureau Veritas) has been engaged by Drax Group plc (“Drax”) to provide limited assurance of selected biomass supply chain indicators for Drax Power Station, as reported in its Annual Report & Accounts 2025 (the ‘Report’). The objective is to provide assurance to Drax and its stakeholders over the accuracy and reliability of the reported information and data.

2. Scope of Work

The scope of our work was limited to assurance over the following information included within the Report for the period 1 January to 31 December 2025 (the ‘Selected Information’):

- Total volume of fibre (material consumed at Drax Power Station) (t)
- Proportion of woody biomass consumed at Drax Power Station with a SBP⁽¹⁾ Compliance claim (%)
- Average biomass supply chain GHG emissions (kgCO₂e/MWh)

3. Reporting Criteria

The Selected Information needs to be read and understood together with the *ESG Sustainability Basis of Reporting 2025 (25 February 2026, version 1)*, as set out at <https://www.drax.com/esg-databook-2025>. Biomass supply chain emissions for individual pellet plants are calculated using the Drax biomass carbon calculator, available at <https://www.drax.com/sustainability/the-biomass-carbon-calculator/>.

4. Limitations and Exclusions

Excluded from the scope of our work is assurance of information relating to:

- Activities outside the defined assurance period;
- Positional statements of a descriptive or interpretative nature, or of opinion, belief, aspiration or commitment to undertake future actions; and
- Other information included in the Report other than the Selected Information.

The following limitations should be noted:

- This limited assurance engagement relies on a risk based selected sample of biomass supply chain data and the associated limitations that this entails.
- The reliability of the reported data is dependent on the accuracy of metering and other production measurement arrangements employed at site level, not addressed as part of this assurance.
- This independent statement should not be relied upon to detect all errors, omissions or misstatements that may exist.

5. Responsibilities

This preparation and presentation of the Selected Information in the Report are the sole responsibility of the management of Drax.

Bureau Veritas was not involved in the drafting of the Report or of the Reporting Criteria. Our responsibilities were to:

- obtain limited assurance about whether the Selected Information has been prepared in accordance with the Reporting Criteria;
- form an independent conclusion based on the assurance procedures performed and evidence obtained; and
- report our conclusions to the Directors of Drax.

6. Assessment Standard

We performed our work to a limited level of assurance in accordance with International Standard on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements Other than Audits or Reviews of Historical Financial Information (effective for assurance reports dated on or after December 15, 2015), issued by the International Auditing and Assurance Standards Board.

7. Summary of Work Performed

As part of our independent assurance, our work included:

1. Conducting interviews with relevant personnel of Drax;
2. Reviewing the data collection and consolidation processes used to compile Selected Information, including assessing assumptions made, and the data scope and reporting boundaries;
3. Reviewing documentary evidence provided by Drax;
4. Agreeing a selection of the Selected Information to the corresponding source documentation;
5. Reviewing Drax systems for quantitative data aggregation and analysis, including but not limited to any updates to the Drax biomass carbon calculator as relevant;
6. Reperforming a selection of aggregation calculations of the Selected Information; and
7. Assessing the disclosure and presentation of the Selected Information to ensure consistency with assured information.

A 5% materiality threshold was applied to this assurance. It should be noted that the procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

8. Conclusion

On the basis of our methodology and the activities and limitations described above nothing has come to our attention to indicate that the Selected Information is not fairly stated in all material respects.

Total volume of fibre (material consumed at Drax Power Station)	7,739,645 t
Proportion of woody biomass consumed at Drax Power Station with a SBP Compliance claim	99.95%
Average biomass supply chain GHG emissions	87.09 kgCO ₂ e/MWh

(1) Sustainable Biomass Program certification

Bureau Veritas UK Limited Independent Assurance Report continued

9. Statement of Independence, Integrity and Competence

Bureau Veritas is an independent professional services company that specialises in quality, environmental, health, safety and social accountability with over 190 years history. Its assurance team has extensive experience in conducting verification over environmental, social, ethical and health and safety information, systems and processes.

Bureau Veritas operates a certified⁽²⁾ Quality Management System which complies with the requirements of ISO 9001:2015 and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, quality reviews and applicable legal and regulatory requirements which we consider to be equivalent to ISQM 1 & 2⁽³⁾.

Bureau Veritas has implemented and applies a Code of Ethics, which meets the requirements of the International Federation of Inspections Agencies (IFIA)⁽⁴⁾, across the business to ensure that its employees maintain integrity, objectivity, professional competence and due care, confidentiality, professional behaviour and high ethical standards in their day-to-day business activities. We consider this to be equivalent to the requirements of the IESBA code⁽⁵⁾.

Bureau Veritas UK Ltd

Registered in England & Wales, Company Number: 1758622

Registered Office: Suite 206 Fort Dunlop, Fort Parkway,
Birmingham, B24 9FD

London, 20th February 2026

(2) Certificate available on request

(3) International Standard on Quality Management 1 (Previously International Standard on Quality Control 1) & International Standard on Quality Management 2

(4) International Federation of Inspection Agencies – Compliance Code – Third Edition

(5) Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants