

2020

Environmental, Social and Governance Report



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CEO Statement

Welcome to InterGen's first Environmental, Social and Governance (ESG) Report. This report introduces our approach to ESG and shares the ongoing efforts we have undertaken to make our business more sustainable and resilient, with a special focus on our contribution to the energy transition. I hope it provides valuable insight into our purpose and actions.

At InterGen, we are committed to being an active partner in the energy transition for generations to come. Leveraging over 25 years' experience in the market, we will continue to support the energy transition by providing flexible generation to ensure the stability of the grid as renewable generation increases, and we will develop innovative solutions that keep the lights on, at a manageable cost for our customers.

Our business is about providing energy to consumers. We may not interact with them directly, but what we do, and how we do it, does affect them directly in terms of available energy or power, our impact on the environment, our provision of jobs and roles within the local communities we work in.

We continue to work with governments to define pathways towards low carbon economies. The world is changing and we recognise that. InterGen is working hard to keep the lights on in the geographies in which we operate, powering businesses and communities. We are also well placed to support the energy transition because our plants are ideal to complement the volatility of renewables and gas as a transitional fuel in Europe, is the least carbon intensive fossil fuel.

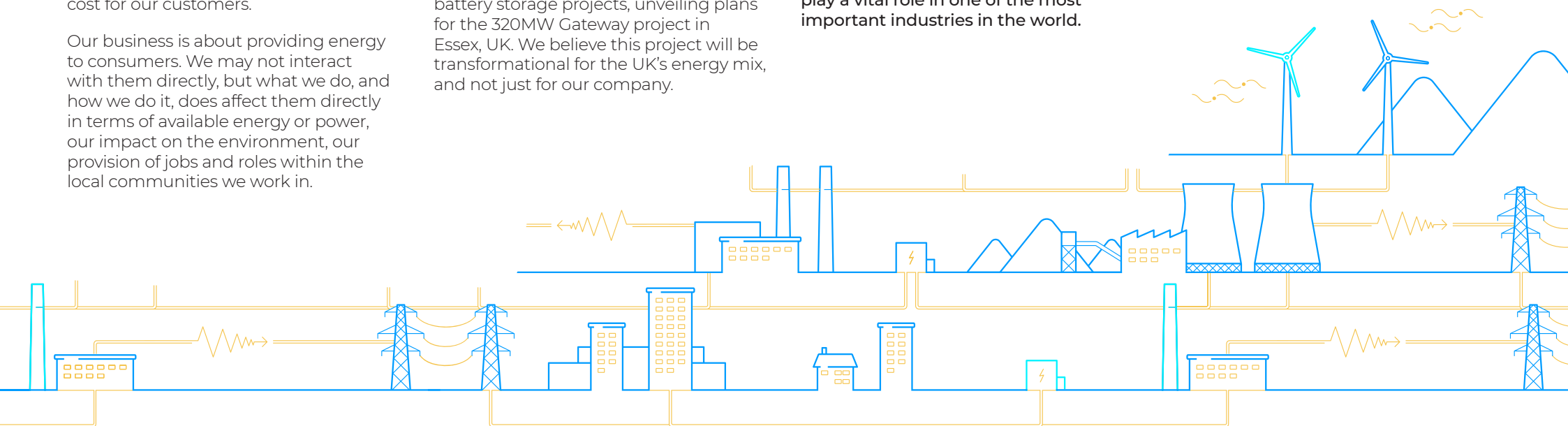
We acknowledge and look to the future – by converting our coal to carbon capture, utilisation and storage (CCUS) in Australia, gas to hydrogen in UK and developing storage and grid stability projects. In November 2020, we announced one of the world's largest battery storage projects, unveiling plans for the 320MW Gateway project in Essex, UK. We believe this project will be transformational for the UK's energy mix, and not just for our company.



2020 was a year like no other. I am proud of the InterGen team for demonstrating engagement, passion, commitment and entrepreneurial spirit in continuing to operate and deliver essential energy supplies during the COVID-19 pandemic. We take pride in being part of a tight-knit, highly motivated and successful team, who play a vital role in one of the most important industries in the world.

Whilst we supported business continuity through secure energy supply as a key infrastructure provider, the health and safety of our employees was – and remains – our top priority. We have an exceptional safety record and have focussed on maintaining these high standards during the COVID-19 pandemic. We believe that our robust procedures played a role in limiting the risks to our employees and the communities where we operate, and we continue to take proactive steps to help prevent the spread of the virus.

Jim Lightfoot
President and CEO InterGen



Introduction

InterGen's purpose is to provide energy for generations. Energy that will continue to power the modern world.

Energy for today, tomorrow and future generations.



Introduction

About this Report

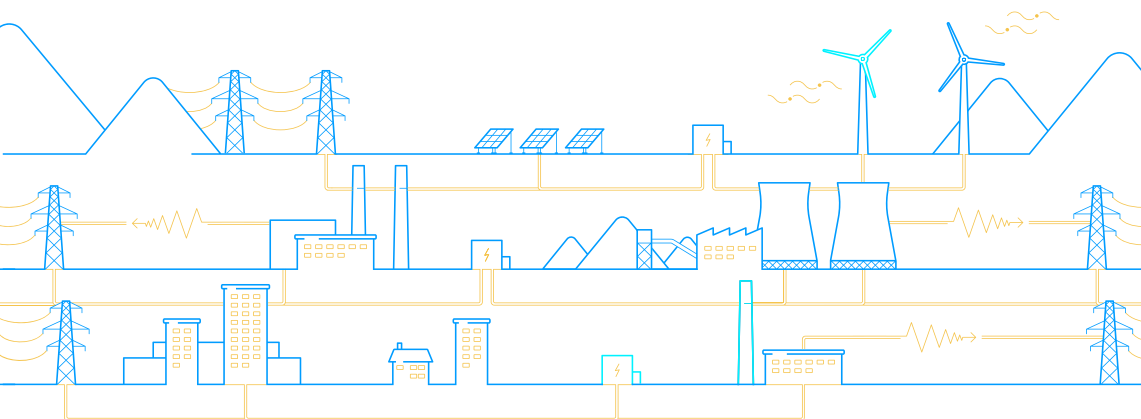
To become a more sustainable and resilient business, InterGen has identified the ESG focus areas that are critical to our organisation and key stakeholders.

The outcome of this exercise is detailed in this - our very first - ESG report. We have shaped this report to provide an update on the highest priority ESG topics for our organisation, including our current initiatives, commitments and ambitions. Where available, we have disclosed performance data covering the ESG activities across our portfolio of assets in the UK and Australia, for the calendar year 2020 (1 January – 31 December 2020).

The process of developing our first ESG report has enabled us to set our baseline across key ESG topics, which we can use to build on, and assess progress against, in the future. Our aim is to enhance our existing ESG efforts, improve transparency and disclosure, look for more opportunities to drive sustainable solutions and improve our operational efficiency and productivity.

The report has been prepared using the Global Reporting Initiative (GRI) Global Reporting Standards as guidance, which are recognised standards for sustainability disclosure.

There is increasing stakeholder expectation that businesses will contribute to addressing the most pressing challenges. The United Nations Sustainable Development Goals (SDGs) is a framework that defines sustainable development priorities and calls for worldwide action among governments, business and civil society to end poverty and create a life of dignity and opportunity for all, within the boundaries of the planet. InterGen aims to contribute to achieving the SDGs through our current initiatives, future commitments and ambitions.



Introduction

About InterGen

Energy for Generations: Our vision is a world with stable, dependable energy for all. One where our customers, stakeholders and the wider community can rely on energy to power their lives, businesses and vital infrastructure. To achieve this vision, we help deliver the flexible electricity solutions that everyone relies on now, and in the low carbon world of the future.

InterGen is a unique business: a developer, owner and operator that generates and trades electricity. We have been generating energy safely and efficiently, for more than 25 years.

Today we have a portfolio of six power stations across the UK and Australia that provide secure, flexible and affordable energy. Our assets provide over 4,000MW of capacity enough to power more than 1.8 million homes. Our experience, size and agility gives InterGen a real competitive advantage, making us a sought-after partner and employer.

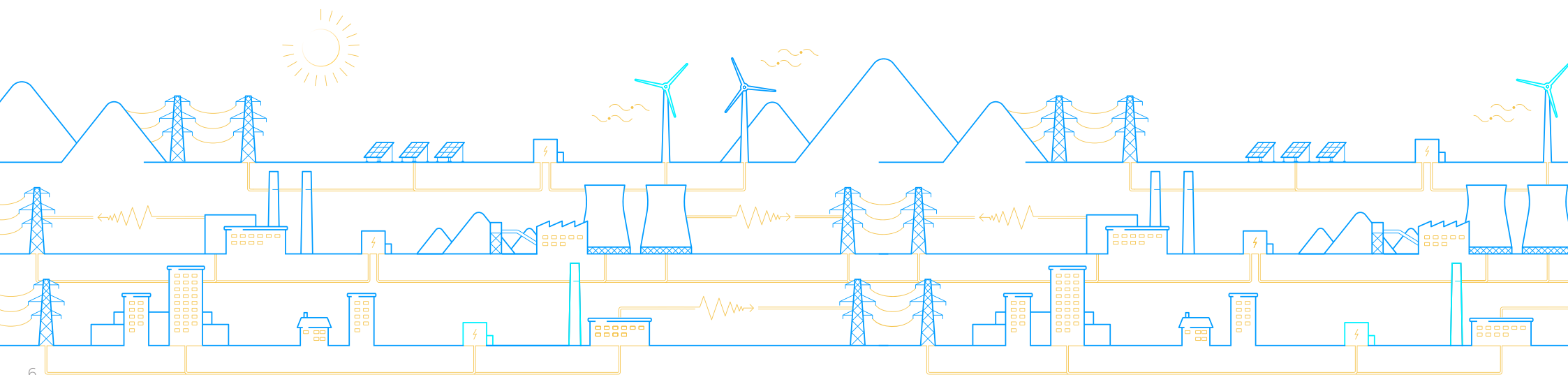
We intend to grow our business in our existing markets, UK and Australia, leveraging our leading trading and asset management platforms. Our principal focus for growth in the near term is to add more flexible generation assets to our portfolio, including battery storage.

We will also continue to invest in our gas assets in the UK to make them more flexible and efficient, resulting in lower gas consumption and carbon emissions.

Unabated gas generation is critical to the security of energy supply in the UK meeting ~40% of current demand and providing critical grid stability services that solar and wind generation technology cannot. In the longer term, gas generation will still be needed with abatement measures such as carbon capture allowing it to provide secure and flexible supplies of electricity.

In countries that are still heavily reliant upon coal, such as Australia, engaging in CCUS can help remove up to 90% of CO₂ emitted emissions, and thus plays a critical role in the energy transition.

In Australia we are seeking approval to participate in an industry-leading CCUS project in conjunction with Glencore affiliate, Carbon Transport and Storage Company (CTSCo). Participation should deliver meaningful benefits to our Millmerran power station, including an absolute reduction in CO₂ emissions. This project is expected to provide a blueprint to reduce carbon emissions across the power sector in Australia.



OUR PURPOSE

ENERGY FOR GENERATIONS

WHAT WE DEPEND ON

Our People and Culture:

Almost 300 talented people who contribute their skills to running our business.

Natural Resources:

Including air, water, gas and coal that is used to generate electricity.

Our Partners:

Our investors, lenders, suppliers and customers who work with us and help shape our business strategy.



VALUE WE CREATE

We create positive impacts for...

Society:

We provide stable, dependable and low-cost flexible electricity for all.

Our people:

Enabling growth through personal development and training. Attracting and growing talent with our graduate programmes and apprenticeships.

The environment:

Contributing to the energy transition through deployment of low carbon support technologies such as battery storage.

Our communities:

We support the economic, societal and environmental health of the communities in which we operate.

PRODUCTION, GENERATION AND SUPPLY

ENERGY SALES AND TRADING



Gas

As the UK transitions to a low carbon energy system, our gas plants will play a critical role in providing the essential flexible generation and system services required to complement intermittent renewable generation as well as offering future decarbonisation opportunities through hydrogen combustion and carbon capture use and storage technology (CCUS)



Coal-fired plants

Our two coal fired plants are among the most efficient and low cost facilities in Australia. Our plants at Millmerran and Callide C provide significant levels of baseload generation providing secure supplies and essential system services to consumers in Queensland whilst offering future decarbonisation opportunities through CCUS



Battery storage

Developing a large scale energy storage capability will help to resolve the challenge of the intermittency of renewable generation. We're working on this right now, with planning consent for battery storage facilities in the UK of up to 2GWh



Solutions that exceed customer expectations

With well-established and experienced trading and asset management teams in Edinburgh and Brisbane, we sell our electricity and related services to utilities, large industrial consumers and system operators in both the UK and Australia

FLEXIBLE ENERGY SOLUTIONS

Introduction

2020 at a Glance

The safety and wellbeing of our employees and contractors was paramount in 2020 as we faced the unprecedented challenge of the COVID-19 global health pandemic. As a key infrastructure provider during this period, we recognise our wider societal responsibility as a business to maintain secure electricity supplies and support our wider community. Our plants continue to operate during the pandemic without major disruption related to COVID-19.

Our Business is Located in the UK and Australia

1.8million

Homes powered for a year

10.9TWh

'Power/ electricity' generation

87.8%

Fleet availability

1.7million

Person hours worked

120million

Light-Emitting Diode (LED) lightbulbs powered for a year

291

Employees (split: UK 164 and Aus 127)



Our approach to ESG



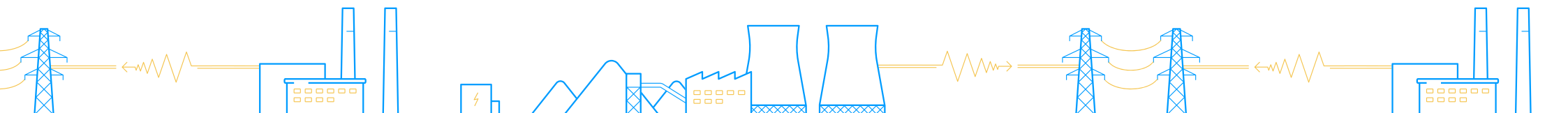
Our approach to ESG

At InterGen we are passionate about enabling the energy transition.

Electricity security is often referred to as “security of supply” or the more literal phrase of “keeping the lights on”. The ultimate goal is to provide electricity to homes and businesses reliably and at a reasonable cost.

We support the energy transition by providing the flexible generation needed to keep the lights on and to facilitate the ongoing rollout of renewables. Our assets work flexibly and harmoniously with renewable generation sources and national grids, to ensure the stability of energy supply, even when the wind doesn't blow or the sun doesn't shine.

We also seek to mitigate the impact of our current operations on the environment, through plant enhancements, efficiency improvements, as well as exploring new technologies such as hydrogen and carbon capture. We are also developing flexible low carbon opportunities such as battery storage. We are proud to share these case studies with you in this report.



Our approach to ESG

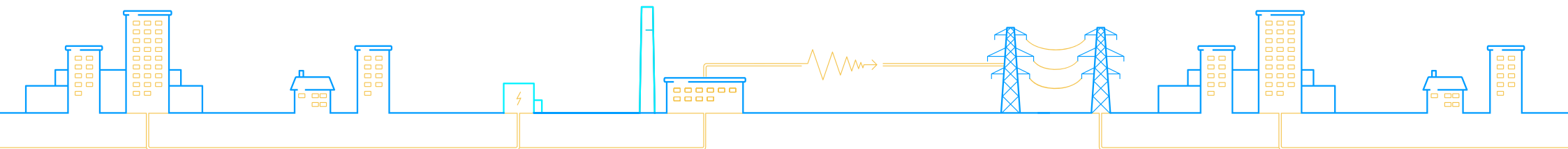
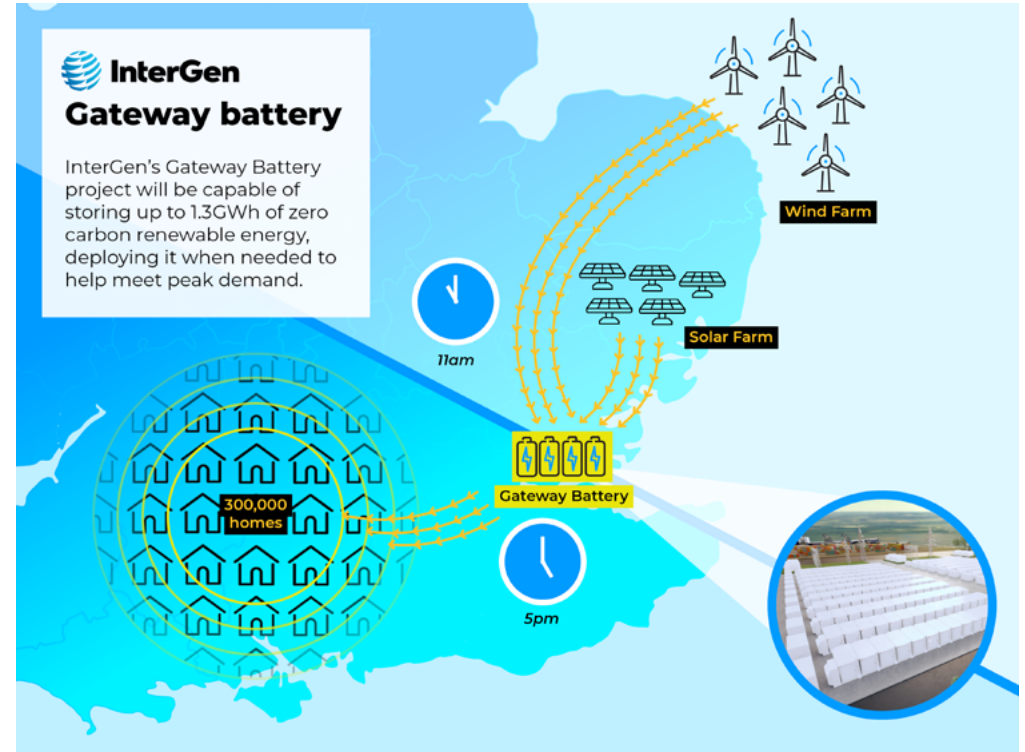
Energy transition case study

The power of batteries to keep the lights on

The continued growth of renewable energy sources, such as wind and solar, are critical to the world reaching net zero emissions. However, these sources only generate electricity when the wind blows or sun shines, and this may not always be when power is most needed by the grid. This challenge has led to a significant growth in the use of battery storage to support the electricity system, as batteries can store the renewable energy generated by wind and solar for flexible deployment when it is most needed at peak times of the day.

Lithium-ion batteries are a proven energy storage technology and a key part of our long-term strategy. With our market-leading trading and asset management platform we are well positioned to develop, build and operate these assets in our existing and new markets.

In 2020, InterGen was given approval to develop Europe's biggest battery storage project after the UK government granted planning consent for its £200 million development at London Gateway Port and Logistics Park in Essex. The project will be able to provide instantaneous power for up to 300,000 homes for two hours. Initially it is set to provide 320MW/640MWh, with the potential to expand to 1.3GWh – more than ten times the size of the largest battery currently in operation in the UK and set to be one of the largest in the world. Physically, it will occupy around 12 acres. We are proud to be working with DP World, the owner of the Port and Logistics Park where the project is located, providing excellent access to existing infrastructure close to a large demand centre.



Our approach to ESG

InterGen's Contribution to the Sustainable Development Goals (SDGs)

The SDGs consist of an ambitious set of 17 goals underpinned by 169 targets and indicators aimed at ending poverty, improving health and wellbeing, and ending inequality by 2030.

We want to help achieve the SDGs by focusing our efforts in the areas where we can make the greatest contribution.

In 2020, our mapping process identified six SDGs that align with our material ESG topics and provide opportunities for InterGen to have a positive impact. We are refining our approach and intend to report on future progress across each of these areas in future reports.



We are committed to providing energy for generations, whilst becoming a more sustainable energy provider. We are working to achieve this through continual investment in innovative energy storage alternatives and looking for ways to increase efficiencies within our own operational processes for our conventional fossil fuel assets. We aim to provide flexible generation to ensure long term stability of the grid, which will also enable the growth of renewables.



The energy sector has a positive contribution to make towards climate action. We support national policies in relation to climate change and aim to have a global approach to our ESG initiatives. We will engage in knowledge sharing around technological breakthroughs and transformative practices



We play a key role in ensuring that we provide decent work and economic growth in the communities we operate in, especially in rural areas such as Millmerran, Biloela (Australia) and Spalding (UK). Our global network of almost 300 employees as well as contractors and suppliers, are the backbone of our organisation, and have enabled our continued success for over 25 years. Empowering and motivating our employees is integral to our continued success.



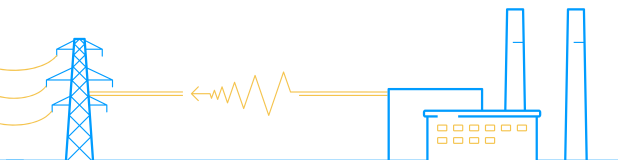
Sustainable consumption of natural resources is an important part of our longer-term ambition of reducing our impact on the environment by using resources more efficiently. As part of our ongoing commitments to ESG, we are working to increase transparency of our environmental metrics year on year. We also continue to invest in programmes to limit waste and improve water efficiency.



We are committed to working collaboratively with partners to enable technological transformation, through resource efficiency and sustainable energy storage solutions.



Organisations cannot work alone to achieve a more sustainable world, with partnerships being critical to accelerate progress towards achieving the SDGs. We recognise the importance of partnerships, which are vital for many of our ongoing initiatives, including our battery storage project, and we will continue to work collaboratively with partners and governments to offer solutions enabling the energy transition.



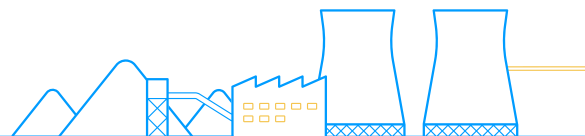
Our approach to ESG

InterGen's Material Topics

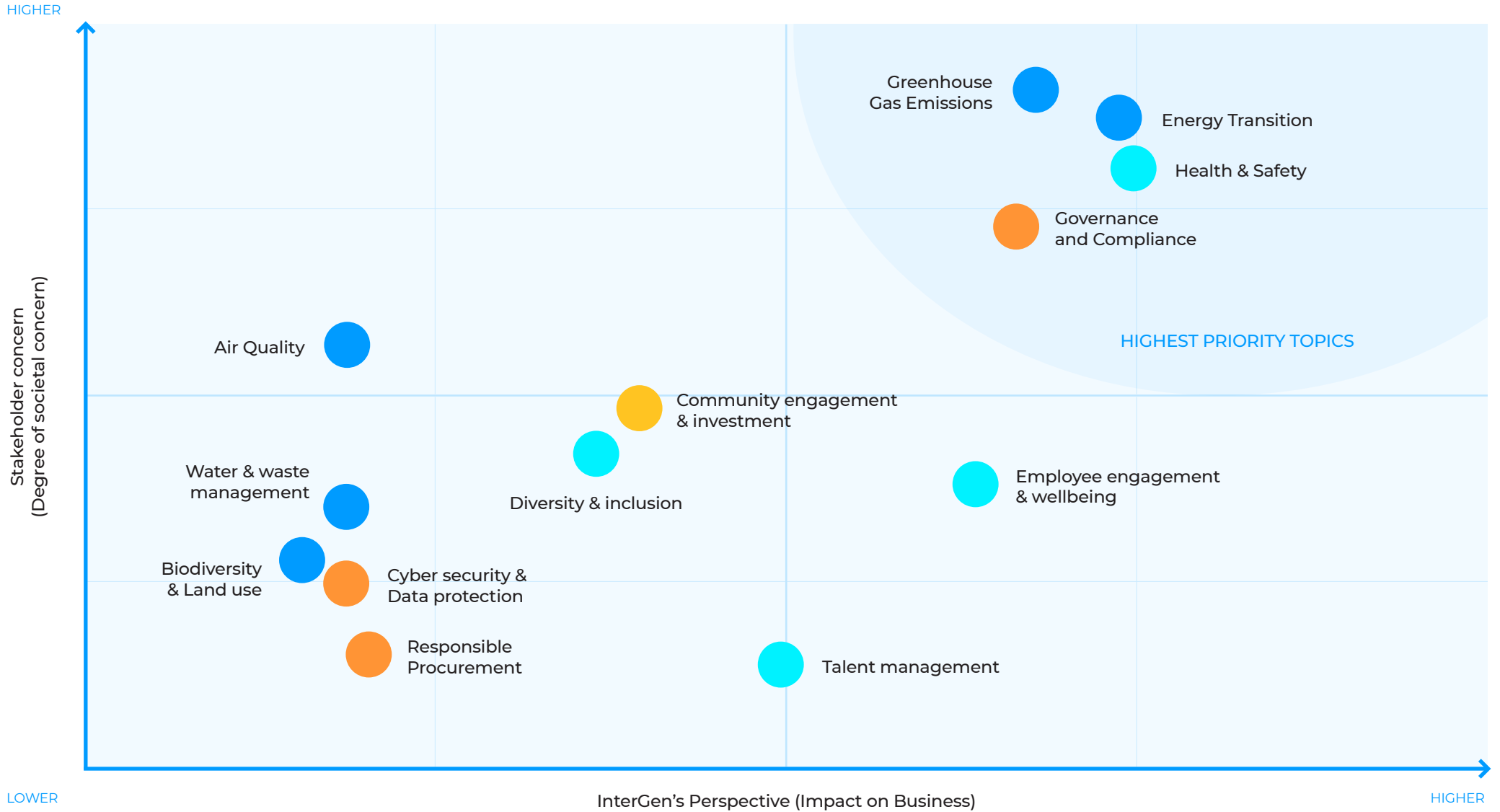
In 2021, we undertook a materiality assessment to prioritise the key sustainability topics that matter most to our business.

Our assessment was informed by undertaking desk-based research on sector and industry-specific trends, incorporating relevant inputs from sustainability frameworks including the GRI Standards, the Sustainability Accounting Standards Board (SASB) and the UN SDGs. Additionally, the process involved research about the material topics considered by our peers. We also engaged with key internal and external stakeholders to capture their views on material ESG risks and opportunities relevant to our business.

Thirteen topics emerged, as depicted in our materiality matrix below. Whilst all the topics in the matrix are material to us, it illustrates the relative importance of each topic in relation to their impact on our business and relevance to our external stakeholders. We commit to reviewing the materiality assessment annually as we respond to the changes taking place in our industry and the world.



Our 2020 Materiality Matrix



Managing our impact on the environment



Ensuring the safety and wellbeing of our people



Being good neighbours



Acting as a responsible business

Areas of Impact



Managing our impact on the environment



Ensuring the safety and wellbeing of our people



Being good neighbours



Acting as a responsible business

Areas of Impact



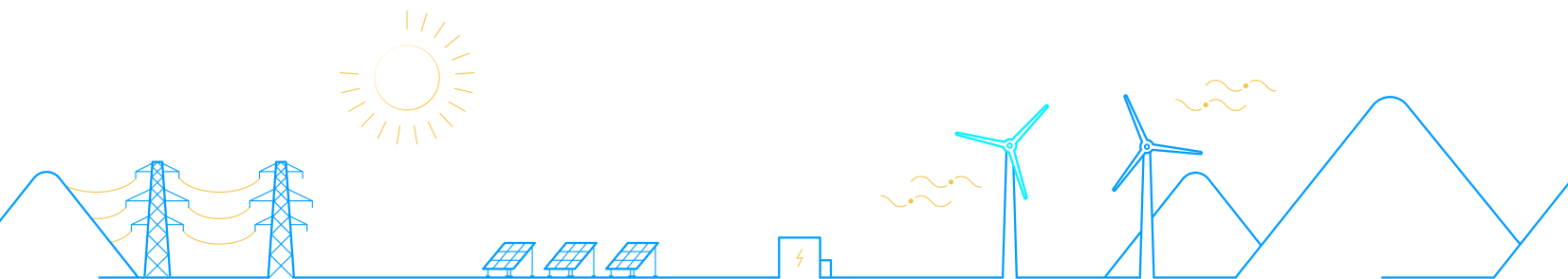
Managing our impact on the environment

The [International Energy Agency IEA's report](#) (May 2021) sets out a course for what the global energy system must do to support a pathway that limits global warming to 1.5°C. For the first time, the world has a plan to assess progress in the highest emitting sectors. This requires a huge shift in spending on research and development, as well as deploying clean energy technologies and then putting them at the core of energy and climate policy. It also highlights that progress in the areas of advanced batteries, electrolyzers for hydrogen, and direct air capture and storage has the potential for high impact on emissions levels.

At InterGen, we are already innovating and focussing on new technologies that have a positive impact on the environment, including battery storage, CCUS and hydrogen.

We are continuing to provide reliable, flexible, low-cost power, to support the increased electrification of our homes, businesses and transport networks. We also provide grid stability services that in turn supports increasing renewables penetration.

Gas has been an essential element of the UK's energy system for more than 30 years and has been an important factor in reducing absolute emissions as coal has been displaced. We will continue to operate our gas assets responsibly and continuously optimise and improve our Australian coal plants, recognising it remains a key fuel source for power generation in Australia. We are committed to not buying or building new coal plants, with the aim to reduce our absolute emissions and our carbon footprint and support the growth of solar and wind power.



Areas of Impact



Greenhouse Gas Emissions and Air Quality

We are taking the necessary measures to reduce our greenhouse gas (GHG) footprint by researching and investing in energy saving solutions, such as operational efficiencies and innovative energy storage solutions, whilst ensuring we keep the lights on for our customers.

Our GHG emissions come predominantly from our plant operations (particularly our coal-fired plants in Australia). In the UK, all of our power is generated from natural gas, which produces significantly less carbon emissions than coal. Of our six global assets, three are combined cycle gas turbines, which achieve a higher level of fuel efficiency than traditional gas turbines.

Carbon emissions data

To be able to measure our GHG emissions against a baseline, we have calculated our direct (Scope 1) and indirect (Scope 2) emissions.

Metric	Unit	Footnotes	2018	2019	2020
Climate Change					
Total scope 1 emissions	Metric tonnes of CO2e equivalents	a	5,561,637	6,660,819	5,772,045
Total scope 2 emissions		a	7,646	8,847	9,393
UK scope 1 emissions		a,b	2,369,389	3,575,166	2,638,566
UK scope 2 emissions		a,c	242	233	91
Australia scope 1 emissions		a,d	3,192,248	3,085,653	3,133,479
Australia scope 2 emissions		a,d	7,404	8,624	9,302

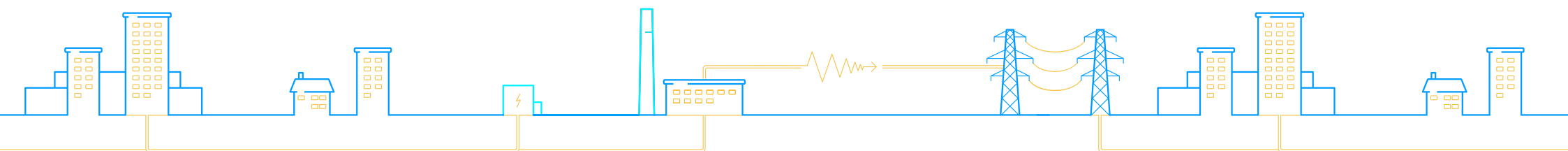
Footnotes

a) Climate change data includes CO2e from all of InterGen's operational assets in the UK and Australia. Calculations for each are defined in footnotes b, d and e. InterGen have taken an equity share approach when accounting for its GHG emissions. Under this approach, InterGen have accounted for all GHG emissions from operations according to its share of equity in the operation. This in accordance with the [Greenhouse Gas Protocol Corporate Accounting and Reporting Standard](#).

b) Using gas consumption data in GJ for all UK assets, converted into kWh using Defra conversion factors. Defra conversion factors are applied for natural gas on a gross CV basis (as advised in Defra reporting guidelines) to derive: kg CO2 kg CH4 KG N2O. Then converted into metric tonnes.

c) All electricity consumption data from UK sites in kWh. Applied Defra conversion factors from the corresponding years of consumption. Calculated total GHG emissions in tonnes (tCO2e) based on Defra emission factor (kgCO2e per kWh of purchased electricity). No disclosure of renewable sources used has been included in this year's reporting.

d) Australian data is taken from InterGen's submission to the regulatory authorities under the National Greenhouse and Energy Reporting Act 2007 (NGER) and reported using the following timelines, 01/07/17 - 30/06/18; 01/07/18 - 30/06/19; 01/07/19 - 30/06/20.



Areas of Impact



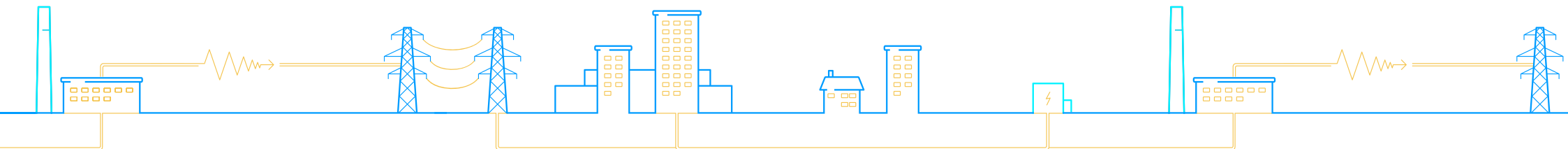
Energy consumption

Across our plants and offices, we continuously look for ways to reduce our energy consumption.

Our lighting upgrade programme at Rocksavage Power Plant, UK

In 2017, we undertook a four-year improvement plan to upgrade the majority of our lighting to high efficiency LEDs, thereby reducing energy usage and improving maintenance-related down time. Using cherry pickers and scissor lifts, we completed the full upgrade across the entire plant, including the high level street lighting.

We have seen an overall improvement in lighting circuits by around 20-30%, due to a reduction in faults, and the upgrade has increased the life expectancy of the lightbulbs to approximately seven years, causing a reduction in waste and cost. The improvement programme also has reduced our power consumption by 38,544 Kwh/year.



Areas of Impact



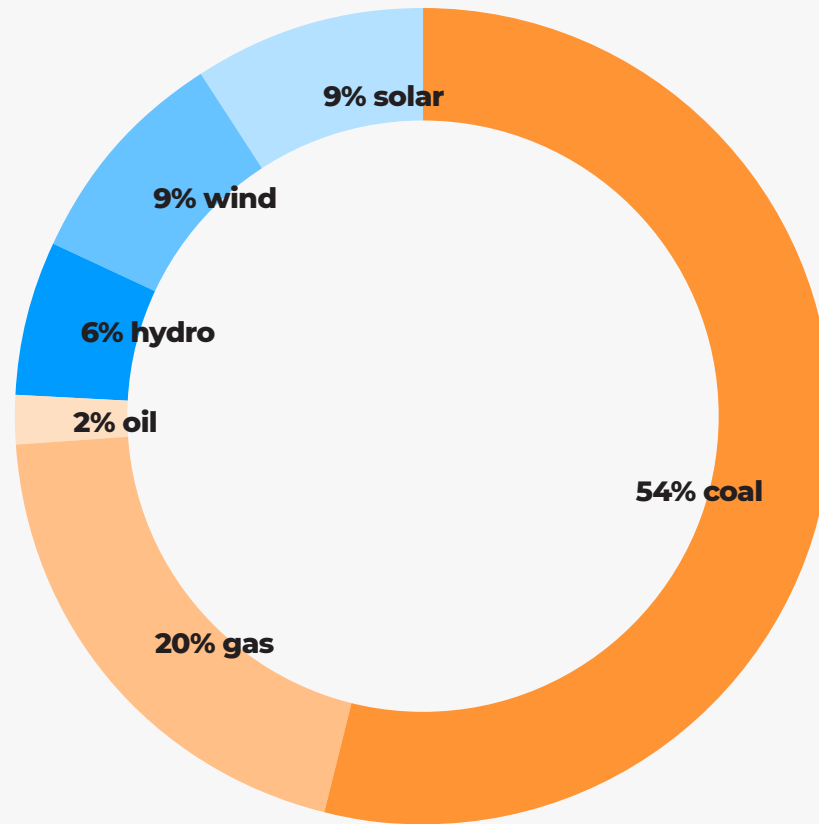
Australia's transition from Coal

In 2020, Australia remains heavily reliant on coal generation and **coal accounts for over half of electricity generation.**

Australia's Energy Statistics 2019-20

24% of total electricity generation in 2020

76% total electricity generation in 2020

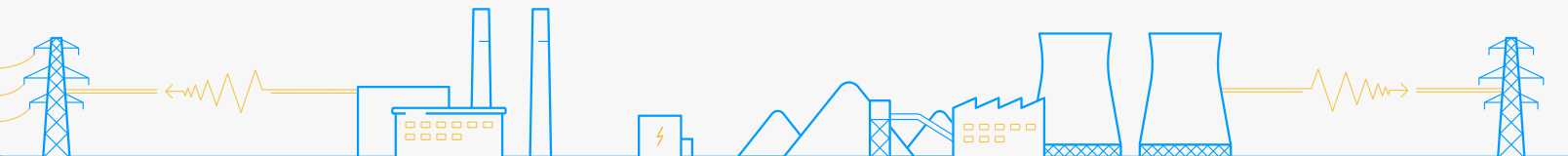


At InterGen, we recognise the environmental impacts of coal, and aim to reduce and mitigate our emissions wherever possible.

In Australia, our coal fired power stations are both advanced cycle supercritical power plants. We invested in these modern, higher efficiency assets as they have 19% lower [carbon] emissions than traditional coal fired plants. Thanks to this technology, Millmerran power station has the lowest carbon emissions of any coal plant in Australia's National Electricity Market.

In 2003, we completed our first carbon offsetting project at our Millmerran site as part of a trial with the Department of Agriculture and Fisheries (Queensland, Australia). We planted 32 hectares of over 40 species of trees with great success. An application has also been made to the Australian government for funding to plant an additional 200 hectares of hardwood trees by December 2023.

InterGen supports the Australian Government's desire to balance economic growth and energy security with carbon reduction; we have been tasked with scoping clean energy investments and are involved in the early stages of a carbon capture and storage project at Millmerran. At our other Australian site, Callide C, we have integrated an energy efficiency improvement programme, including upgrading our C3 turbine in 2019, which is now able to deliver an additional 18MW capacity without any additional fossil fuel consumption or associated increase in carbon emissions.



Areas of Impact



CASE STUDY

Enabling renewable generation and grid strength in Australia

As Australia embarks on its journey to a low carbon economy, Millmerran Power Station (MPS) will play a critical role in providing the following:

1. Support renewable generation using grid following inverters

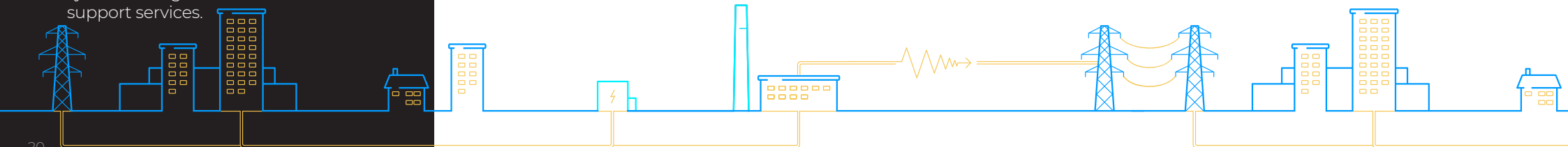
MPS supports the connection of inverter-based renewable energy generation, by acting as a strong voltage source that is located close to large Renewable Energy Zones (REZ) in southern Queensland and reasonably close to other REZs in New South Wales.

2. Provide inertia and system stability support by contributing to a minimum level of synchronous generation

MPS is a synchronous generator, providing system strength and other network services to support stable operations, particularly important given the increasing penetration of renewables.

3. Contributing the reliable capacity to maintain generation output levels against intermittent renewable power sources

The plant is reliable with a low forced outage rate, reliably contributing to system strength and other network support services.



Areas of Impact



Air Quality

Significant air emissions (separate to GHG emissions) are regulated under international conventions and national laws. These typically include any harmful air pollutants, such as nitrogen oxides (NO_x), sulphur oxides (SO_x) and carbon monoxide (CO).

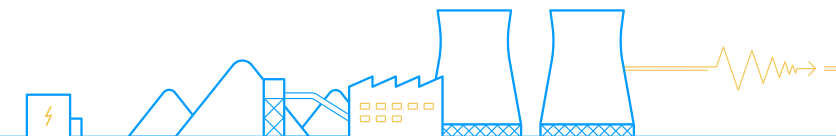
We are committed to managing and measuring these air emissions to minimise any risks to human health and our environment.

Both nitrogen oxides and sulphur oxides are emitted during the combustion processes at our gas and coal powered sites. However, we recognise that the majority of our emissions come from our coal operations in Australia due to the nature of the combustion process.

Air emissions	Unit	Footnotes	2018	2019	2020
Total Sulphur Oxides	Metric tonnes	d	44,603	41,320	42,829
Total Nitrogen Oxides		d	24,002	25,239	33,119
Total Carbon monoxides		d	2,206	2,393	2,343
UK Sulphur Oxides			3	13	9
UK Nitrogen Oxides			824	1,187	919
UK Carbon monoxides			534	766	702
Australia Sulphur Oxides		d	44,600	41,307	42,820
Australia Nitrogen Oxides		d	23,169	24,052	32,200
Australia Carbon monoxides		d	1,672	1,627	1,641

Footnotes

d) Australian data is taken from InterGen's submission to the regulatory authorities under the National Greenhouse and Energy Reporting Act 2007 (NGER) and reported using the following timelines, 01/07/17 - 30/06/18; 01/07/18 - 30/06/19; 01/07/19 - 30/06/20.



Areas of Impact



Water and Waste Management

Water

At InterGen, we are mindful of the scarce resources we use in our operations, most notably water used in our cooling towers.

We aim to follow best practice guidance on how we use natural resources and operate as sustainably as possible. We do this by using closed circuit cooling towers that require a lower volume of recirculated water, thereby reducing the amount of water requiring treatment.

Although our water usage is relatively low across our operations, we are always looking to find new ways to increase efficiency and reduce costs. At our Coryton plant in the UK, we have recently invested in new water efficiency methods, including high specification drain valves to reduce water losses and new technology to decrease flushing and cleaning within the power plant.

Recognising the increased water usage from our Australian sites due to the nature of coal plant operations, we have developed a suite of policies to support the management of water resources. This includes a water management plan to assist employees in managing water run-off, water storage and sediment control.

Water	Unit	Footnotes	2018	2019	2020
Water consumed	m3		12,841,176	13,530,840	11,920,231
Waste water discharge		e	839,821	430,101	256,181

Footnotes

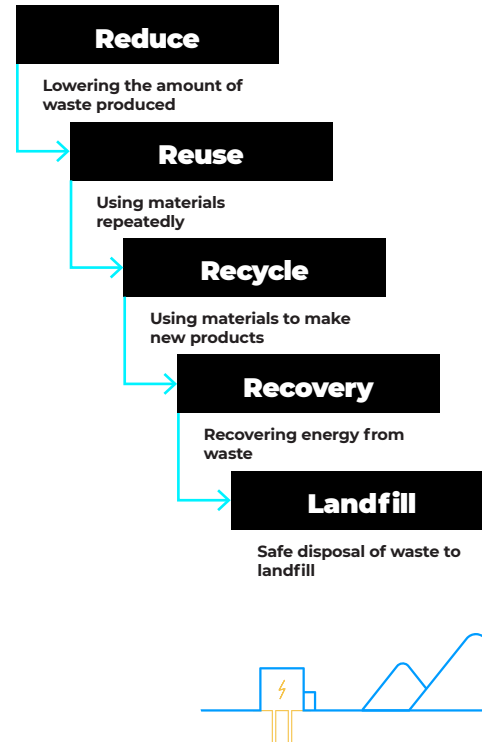
e) Excluding Calide C's data.

Waste

Our waste management process is guided by local policies that encourage efficiency. We always consider waste reduction, prior to landfill (see UK waste management hierarchy graphic below). Most of our waste is not generated by economic activity, but comes

from associated support services like maintenance activities during major outages, upgrades or renewal projects for existing sites. We aim to reduce our waste as much as operationally possible.

In Australia, we have a management procedure that clearly outlines the segregation, storage and disposal of waste. To ensure the effectiveness of this procedure, it is reviewed quarterly.



Areas of Impact



CASE STUDY

Ash recycling at Millmerran, Australia

At our Millmerran site, which is located near the Commodore Mine, we manage ash recycling with the upmost care. At this site we recycle a significant amount of both fly ash and bottom ash and provide to the cement industry. The remaining ash is delivered back to the Commodore Mine for disposal, then covered with rock or soil and added to the natural topography of the region, before being seeded to promote growth of local vegetation.

The data on the right outlines our ash sales for our Millmerran site:

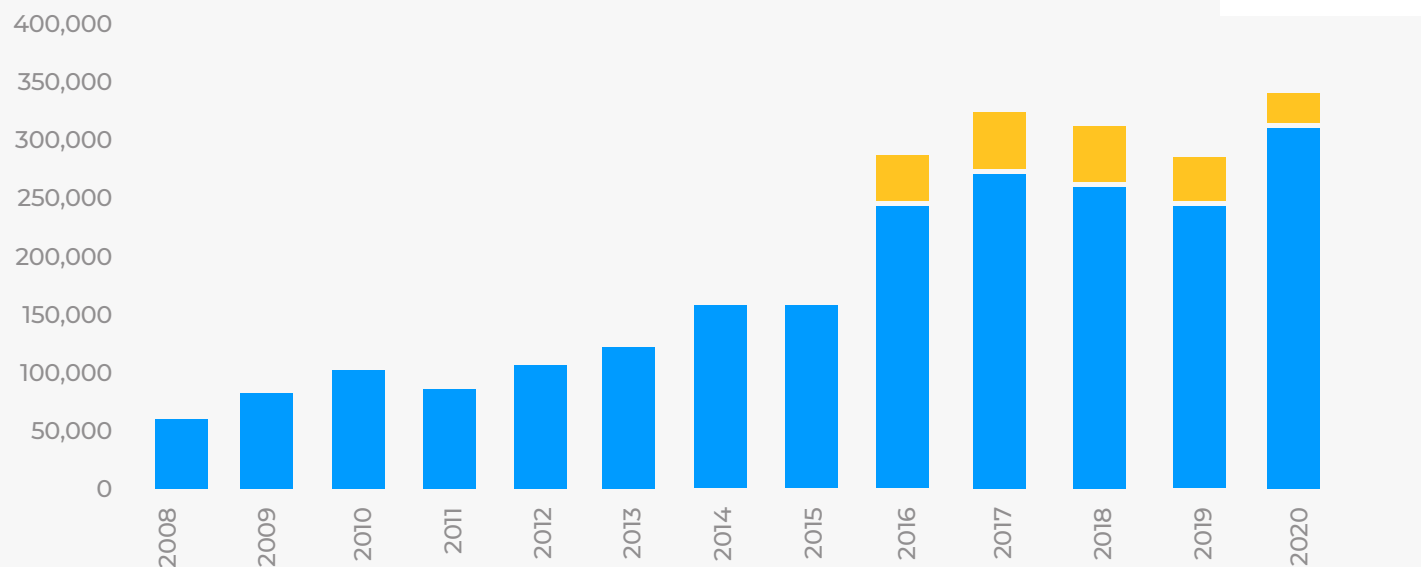
“We are committed to continuing best practice in waste management and following local laws.

We will continue to look for new ways to improve efficiencies across our operations”.



Brent Gunther
Vice President
& Managing
Director, InterGen
Australia

Ash sales (t)



Waste	Unit	Footnotes	2018	2019	2020
Non-hazardous waste - Disposed	Tonnes	f	349	191	199.4
Non-hazardous waste - Waste - recycled		f	280	195.1	240
Hazardous waste - Disposed		e	40.99	13.81	32
Hazardous waste - Recycled		e	25.5	71	12.4

Footnotes

e) Excluding Callide C's data.

f) Data provided represents UK assets, as Australian data is not currently provided in a comparable format.

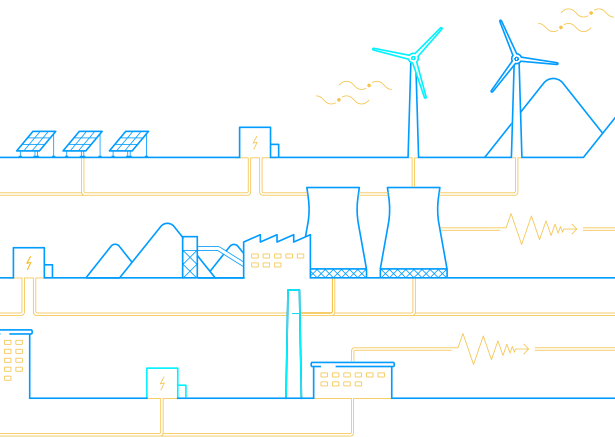
Areas of Impact



Biodiversity and Land Use

Biodiversity and land use are key considerations throughout the lifetime of our operations. This starts at the exploration stage, includes operational analysis and continues through the site closure.

At the start of any potential site operation, we ensure that the relevant procedures are carried out in line with an environmental impact assessment, and where required we employ specialists to oversee any areas where our operations may have an adverse effect on surrounding ecosystems. We engage in activities locally that aim to support and improve local ecosystems and habitats where possible.



Nature reserve at Rocksavage, UK

As part of its commitment to the local environment, Rocksavage embarked on a spring clean of its nature reserve in 2020, clearing walkways and waterways to open up areas for new growth and to encourage wildlife into the area.

The majority of the Rocksavage site, except for its operational areas, falls

within an ecological management plan, and even as the power plant was being developed in the 1990s, families of Great Crested Newts were found, protected, and encouraged to settle in new and existing ponds.

Our aim is to maximise the potential of the land for the natural and historical flora and fauna communities on-site.



Spring flowers blossoming outside Rocksavage Power Plant

Rehabilitation programme at Millmerran, Australia

The Commodore Mine, which is not owned by InterGen, but is where we source our coal for Millmerran, is rehabilitated on an ongoing basis, with approximately 250 hectares rehabilitated to date, which is now ready for agricultural use.

The low strip ratio (3-4-1) of the Commodore Mine, means that the rehabilitation areas is around 25 – 40cm deep, therefore we use a progressive approach to rehabilitation.

Our topsoil stocks and mining methods allow for sufficient replacement of topsoil, and we apply additional efforts to stabilise the land, such that surface water run-off achieves water quality criteria to enable discharge into local waterways.

We engage a third party to provide specialist consultancy expertise during our rehabilitation process, and undertake monitoring assessments annually.

The success of the programme is seen through the land benefiting from the return of local animal species due to the additional trees, shrubs and grasses.

Areas of Impact



Ensuring the safety and wellbeing of our people

Innovation and an entrepreneurial mindset will help us transition to the low carbon future.

At InterGen, we believe that our team is our strongest asset and we are committed to ensuring their safety and wellbeing.

We are monitoring, analysing and preparing for potential challenges and opportunities that the energy transition will bring. Making the most of our talented workforce and embracing their innovative ideas will be imperative to finding energy transition solutions and ensuring job satisfaction and security. Attracting and retaining the brightest talent is a key focus.

We are committed to maintaining the highest level of transparency with our internal and external stakeholders to ensure they are with us every step of the way.

InterGen Values and Culture



Safety is at the heart of everything we do - Everyone that works with InterGen should go home safe at the end of every day. We owe it to ourselves, our families, friends, and our communities, to ensure that safety and wellbeing are our top priorities. As a business we're famous for it and no one wants that to change.



Team players by nature - Everything we achieve is the result of an incredible effort from a wide variety of different people, each bringing their own unique skills, experience and perspectives. We're sociable and we build lasting bonds, we depend on each other to succeed, and working together always makes us stronger.



Entrepreneurs in spirit - We are committed to the growth of our business and we know that we have to adopt an astute, entrepreneurial mindset to make this happen. As a business we thrive on lively, engaged intelligence and the dynamism to approach every scenario with a commercially ambitious outlook.



Integrity always - Doing the right things isn't a question of choice, it's our instinct. In all we do we strive to be open and honest, treating others as we ourselves always wish to be treated.



Community counts - We're fundamentally connected to each other and the world around us. From national grids and global climate to the everyday world of streets and homes, our connections to the communities we are all part of give meaning to what we do.

Areas of Impact



Health & Safety

At InterGen, the safety and wellbeing of our people is at the centre of everything we do. We are proud to have the highest form of management and performance measures within our organisation as we recognise it is critical to protecting the health, safety and wellbeing of our employees.

We are committed to implementing and upholding comprehensive measures that ensure the safe operation of our facilities, in compliance with global best practice, as well as relevant national regulations. We have a dedicated management team responsible for the strategic direction of our Health, Safety, Security and Environment (HSSE) goals and targets. We continuously seek feedback and support to continuously improve and progressively strengthen our HSSE policies, practices and culture.

Our established safety programme has been built up over 25 years and adds value by driving positive behaviour change and is successfully embedded into InterGen's culture. Our programme is truly inclusive and has been developed in-house by our colleagues. In the UK we have branded this **Safety@heart**, however the principles apply globally.

Risk management

We recognise that systematically managing risks is fundamental to our operations. We believe that the foundation of a healthy and safe working environment begins with a robust management approach. We have an executive policy that covers all elements of HSSE management and is implemented across all of our functional areas and locations. The policy clearly outlines safety as one of InterGen's core values, and is key to operational excellence. The topics included in the policy are:

- Health & Safety
- Drug and alcohol programme
- Security
- Environment
- Emergency response plan
- Improvement and compliance
- Reporting

Our current management system is closely aligned with the requirements set out by ISO 45001, and all sites are required to identify, assess and mitigate any reasonable or foreseeable risks.

Driving a safety culture

We understand that ensuring our employees have a safe place to work, means equipping them with the right tools and knowledge to enable them to work safely.

Each year we engage independent experts to assess the health, safety, and cultural maturity of all our sites. Findings from our latest independent assessment, suggest InterGen is on par with peers and the wider sector at embedding a culture of safety at all levels throughout the organisation. Our independent assessors concluded that InterGen is working above minimum compliance at most sites and moving towards a more 'human focussed' approach to safety culture and that employees at all levels own safety as part of their core values.

As an organisation that works in a relatively high-risk environment, we are extremely proud that we have not had any fatalities in our 25 year history and strive to maintain this impeccable standard.

Safety	Unit	Footnotes	2018	2019	2020
Fatalities	Number of employees		0	0	0
UK					
LTIF	200000*LTI/work hours	g	0.41	0	0.42
TRCF	200000*TRC/work hours	g	1.44	0.59	0.85
DART	200000*(RWC+LTI)/work hours		1.17	0.59	0.92
Australia					
LTIF	200000*LTI/work hours	g	0.26	0.61	0
TRCF	200000*TRC/work hours	g	3.2	1.86	2.36
DART	200000*(RWC+LTI)/work hours	h	0.58	0.65	1.15

Footnotes

g) An InterGen lagging indicator safety performance metric that changes month to month based on the number of Medical Treatment Case (MTC), Restricted Work Case (RWC), and Lost Time Injury's (LTIs). It is calculated based on a 12-month rolling number of MTC, RWC, and LTIs and using number of hours worked for current InterGen fleet. As an example Aug 2014 TRCF/LTIF has the previous 12 months MTC, RWC, and LTIs and hours worked back to and including Sep 2013.

h) Excluding Millmerren figures as they do not record this data.

*Please note that all global data excludes Burlington office employees in the US because the office closed in 2018/2019.

Areas of Impact



InterGen's COVID-19 response

To continue to ensure the safety of our employees, while being able to keep the lights on for our communities, we took swift and decisive action towards implementing strict health and safety measures.

This was particularly important given the nature of our operations, as our site operators were not able to work from home. Steps included implementing social distancing measures and staggered work patterns, segregation and screening, cleaning regimes and testing stations.

As a global business, our sites have had to adapt their COVID-19 response to suit national regulations and local circumstances. Regardless, all InterGen entities employed a risk-averse approach and monitored changes daily.



We developed a pandemic planning procedure to sit alongside our suite of health and safety documents, a unique version of this procedure has been made for our sites in England, Scotland and Australian. Our pandemic planning procedures have been regularly updated to reflect national government advice.

In the UK, we engaged in weekly calls with the government, and filed weekly reports on commodities and absenteeism. Whilst in Australia, we have included government measures and other risks associated with our employees working outside.

The intention of these procedures is to provide guidance to all InterGen employees on effective management prior, during, and post-pandemic. As part of this policy, we outline key hygiene factors, risk management procedures and relevant contingency planning. This included

- Effective hand washing technique
- Cleaning protocol
- Procedure for close contact with someone showing signs of COVID-19
- Travel guidance
- Risk matrix for site staffing
- Personal Protective Equipment

Areas of Impact



Occupational health

To ensure the occupational safety and wellbeing of our staff, we make biannual third party occupational health testing available to all staff, which covers hearing, lung function, eye tests, skin conditions and handheld vibration monitoring.

We aim to have approximately 70% of staff at operational sites Institution of Occupational Safety and Health 'IOSH' trained.



Areas of Impact



Employee Engagement and Wellbeing

Teamwork is a fundamental part of our organisational values. We have a talented team, and we actively work to nurture a company culture in which our employees can thrive personally and professionally, enhancing creativity throughout the company.

We strive to keep our employees engaged, motivated and rewarded. To measure our engagement performance, we run an employee survey across the business twice a year, assessing engagement levels, perspectives on leadership and colleagues, personal growth, company alignment, management and overall empowerment and satisfaction. The response rate from our 2020 survey was high at 83%, with the overall results proving positive despite a challenging year due to COVID-19 and changes to working conditions, such as remote working.

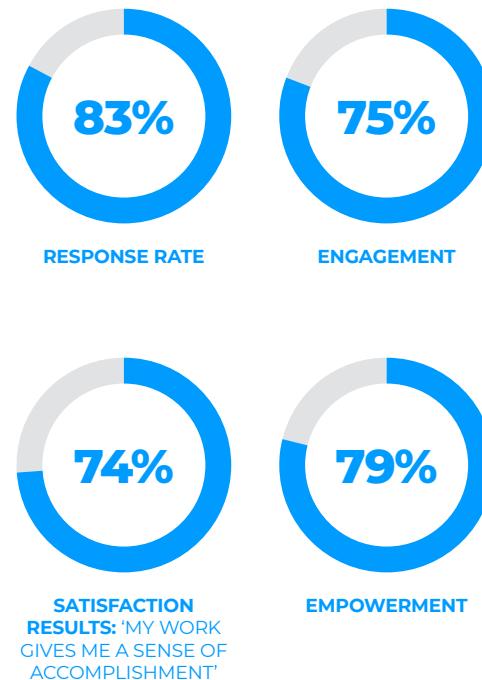
Areas scoring particularly high included safety and wellbeing, understanding how employees can contribute to the success of the company, the company's adherence to its core values and working within and across teams.

Within our internal communication plan, we have a number of opportunities for engagement across the business, these include bi-annual CEO town halls and quarterly updates with the regional leadership teams. The town halls give employees an opportunity

to ask the CEO and leadership team questions, hear the feedback directly and encourages collaboration. The town halls have been hosted online due to COVID-19.

These engagements help identify areas for potential improvement or areas of concern. Most notably in 2020, these included communications focussed on our long-term strategy and how our business will change with the energy transition; and secondly, ensuring we are continuously providing development opportunities to our employees.

2020 pulse survey results



As part of our HSE policy, InterGen has a wellbeing programme that commits to promoting both positive physical health and mental wellbeing through a range of programmes. We are aiming for all of our employees to have undertaken mental health awareness training and this is being facilitated by a number of champions across the sites who have been trained in first aid and mental health.

Recognising the potential increased impact on mental health in 2020, InterGen hosted a week dedicated to mental health awareness in the UK (in May 2020). During that week, mental health training took place for all of our plant employees in the UK.

InterGen Australia joined the 'Mates for Energy' programme providing suicide prevention and intervention skills and suicide awareness training. The training aims to improve general awareness and suicide intervention skills.

- We also provide a number of health and engagement benefits for employees, such as:
- Private medical insurance
- Health and fitness programmes, offering reimbursement for gym and fitness memberships
- Flexible working arrangements
- Free employee assistance programmes and confidential counselling for mental health, health and wellbeing, legal and financial issues.



Areas of Impact



Talent Management

Hiring and retaining a highly skilled workforce is critical to our success. There is a high demand for specialist skillsets to accelerate our contribution to the energy transition and to overcome wider industry challenges.

Our dedicated Human Resources team are committed to attracting and retaining the best people by ensuring our culture and values are underpinned by market-benchmarked compensation, as well as the supporting policies, practices and enhanced programmes.



“I joined InterGen in March 2015. Reflecting on my time at InterGen, what I value most about working here is the level of support I have received from colleagues, the variety of work to which I have gained exposure, the opportunity to learn from high calibre individuals, and the chance to build my knowledge on an interesting and changing UK energy industry.”

Kalai Cheng
Group Tax Associate

Training & Development

Depending on job role and skillset, employees are required to complete on-the-job and online training courses. Not only does this enable them to fulfil the immediate requirements of their role, but ensures they remain safe at work and it promotes continual learning and skills development.

As a result of the COVID-19 pandemic, most of our office staff have been working from home since early 2020. To continue to invest in their skills, we enhanced our online training platform so that they can access it remotely.

We currently have over 2,500 training courses available online, covering topics from basic IT literacy skills to providing thought leadership courses on diversity and digital capabilities.

Recruitment and retention

We are lucky to have extraordinary experts as part of the InterGen team, who deliver much of our internal technical training. We also invest heavily in external training partners, where we cannot provide suitable capabilities internally.

Despite the challenges of 2020, we have focused on retaining and upskilling staff and increasing our internal resources to meet the demand of the business, by employing additional people where necessary.

New hires	Unit	2018	2019	2020
New hires (global)	% of total employee hires	9.17%	14.06%	13.40%
UK	% of total UK employee hires	11.11%	16.55%	15.24%
Australia	% of total Australia employee hires	6.80%	11.11%	12.60%
Employee turnover				
Employee turnover (global)	% of total employee turnover	10.92%	10.94%	7.56%
UK	% of UK employee turnover	11.90%	10.79%	7.32%
Australia	% of Australia employee turnover	9.71%	11.11%	5.51%

*Please note that all global data excludes Burlington office employees in the US because the office closed in 2018/2019.



Areas of Impact



Apprenticeships and Graduate schemes

We believe the best investment we can make, is in our people. We are constantly developing our talent pipeline, ensuring that we invest in people early in their careers. We are proud of our apprenticeships, graduate schemes and on the job learning opportunities.

InterGen have been supporting apprenticeships for over 20 years

Our apprenticeship programme allows students to work on site, with other qualified engineers and an array of experienced employees. Our electrical and mechanical programme is particularly popular, spread over four years, the programme provides students with the opportunity to progress their development in a number of key areas. As part of our commitment to talent attraction and employee engagement, we also offer a number of other programmes and internal training opportunities, such as our two-year administration traineeship for local young people and supporting plant attendants in obtaining their trade qualifications.

We also recognise that employees need to be supported by an inspiring management team. To ensure we have a consistent management approach, we use external consultants who run a Management Essentials Programme. Within the programme, we focus on developing the management and leadership skills to facilitate the learning and development required to be a great leader. Over the last year we continued this in a virtual environment due to COVID-19 restrictions.



“During our 25 years of operations at Rocksavage, approximately, 40 to 50% of our employees originally come from an apprenticeship scheme, like I did”

Dan Fosberg
Plant Manager Rocksavage



“I joined Coryton as an apprentice in September 2019.

The benefits are endless and I highly recommend the programme. I have gained hands-on experience with engineers and technicians. I personally also benefitted from learning communications skills. The team are very welcoming and I have learnt so much.”

Taylor Newell
Apprentice at Coryton Power Station



“I joined as a graduate in September 2019.

From day one, the sense of community, openness and camaraderie has been palpable. This extends throughout the office and into the wider company, with people at all levels being highly approachable and friendly.”

Chris Terry
Shift Trader, Edinburgh

Areas of Impact



Diversity and Inclusion

At InterGen we are committed to embracing all forms of diversity in the workplace, providing equal employment opportunities for all, regardless of race, religion, gender, age, gender, sexual orientation and disability, to name a few. We believe a diverse workforce fosters new and innovative ideas that contribute to our overall long-term success.

The power generation sector has traditionally been dominated by men. At InterGen, we are committed to addressing all forms of inequality. Our gender pay gap is 20%, which is broadly in line with the wider energy sector, however closing this gap is a key component of our Diversity and Inclusion (D & I) Action Plan.

As part of our action plan we have joined the Energy & Utility Skills Partnership D & I commitment to work with our industry partners to improve the overall sector attractiveness. Whilst recognising we want to improve all aspects of D & I, we are focussing our initial efforts on improving our gender balance by looking at how we attract more females into engineering and technical roles and supporting their ongoing career development into senior leadership roles. Through this plan, we will continue to invest in women in science, technology, engineering, and mathematics (STEM) projects. We are also reviewing our recruitment, selection and promotion process to ensure it continues to be fair.

Our STEM ambassador programme aims to engage females within local schools into engineering. We do this through a structured programme that includes STEM-specific professional development for teachers, engagement with InterGen STEM ambassadors and schools and support for STEM clubs.

The Inclusion Commitment

“At InterGen we are focussed on providing Energy for Generations. Our team is our greatest asset, and ensuring we have talented people helping us deliver our ambitious strategy is vital to our continued success. For us, inclusion goes hand in hand with enabling our innovative culture. We are proud to participate in the Energy & Utility Skills Partnership Inclusion Commitment. Working with our sector partners we look forward to maintaining and improving on our attractive and inclusive working environment into the long term.”

Jim Lightfoot
InterGen CEO

As part of our commitment to diversifying the industry, on 19 May 2021, InterGen signed ‘The Inclusion Commitment’, as part of the energy and utilities skills partnership led by sector employers in the UK.

The commitment aims to support organisations to drive diversity across all areas, with a key focus on, women, people with disabilities, the Black, Asian and Minority Ethnic (BAME) community and under 24s – which we believe have traditionally been underrepresented in our industry.

Close to 50 major employers across the power, gas, water and waste sector have now signed the Inclusion Commitment, with the aim to drive diversity through talent attraction, inclusivity and diversity in the workforce that is reflective of the customers and communities we serve.

The commitment is underpinned by five core principles:

Collaborative Working: Work collaboratively as a sector to drive change, challenging ourselves to do things differently, by sharing best practice and delivering sector priorities.

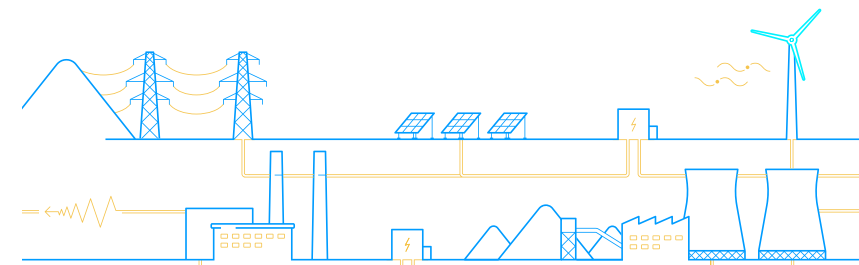
Holistic Inclusion: Focus on inclusion in its entirety, however our sector history requires targeted sector action to start by increasing gender, BAME and disability workforce representation.

Measurement and Transparency: Measure and be transparent about progress in our individual organisations and as a sector.

Creating Inclusive Cultures: Ensure we create the culture we need to attract the workforce of tomorrow.

Inclusive Recruitment and Progression: Be inclusive in the way we attract, recruit and develop our people.

	✓ BAME	♿	♀	U24
Cross Sector	5%	13%	17%	8%
Power	8%	13%	24%	7%
Gas	8%	11%	23%	6%
Water	4%	12%	20%	8%
Waste	4%	16%	15%	6%
All UK Sectors	15%	15%	47%	12%



Areas of Impact



Non-discriminatory procedures

As part of our governance process, we ensure compliance with all applicable local laws governing non-discriminatory practices in employment. Our business is supported by policies ensuring that all facilities and operations take a coherent approach to non-discrimination. These policies also apply to the selection and treatment of contractors and personnel working on our premises.

Our procedure also outlines the requirements for fair recruitment, selection and equal opportunities. Managers are responsible for creating an environment that is conducive to learning and growing, where all employees are treated equally. Our HR department is responsible for supporting managers and employees by enabling them with the right tools and knowledge to ensure that no

unconscious bias enters a decision-making process. Our legal and risk management representatives advise our HR department ensuring procedures and guidelines are consistent with local and international laws.

InterGen explicitly prohibits any employee harassment and any improper interference with our employees is not tolerated.

We will continue to assess our diversity performance against peers and the wider market, including committing to internal KPIs and external commitments.

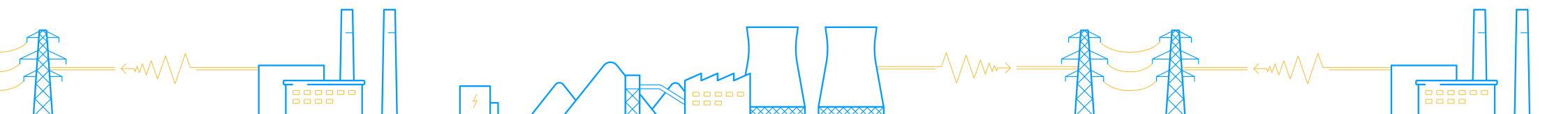
“At InterGen we know that our commitment to Diversity and Inclusion will help us unlock the full potential of our business”

Dave Newborough
Human Resources Director

Metric	Unit	Footnotes	2018	2019	2020
Women on the board	Percentage		25%	17%	17%
Code of conduct	Y/N	i	Y	Y	Y
Grievance mechanisms	Y/N	i	Y	Y	Y
Confirmed incidents of corruption and actions taken	Number of incidents	i	0	0	0

Footnotes

i) Figures are calculated based on the supervisory and management board, combined.



Areas of Impact



Being good neighbours

Electricity is a vital part of all economies, supporting a range of critical and everyday services from healthcare to banking to transportation.

Being great neighbours is part of who we are. We are fundamentally connected to each other and the world around us. From national grids and global climate to the everyday world of streets and homes, our connections to the communities we are all a part of give meaning to what we do.

Community Engagement and Investment

We believe enriching the communities and people around us makes us a better business. We are especially committed to having a positive impact on the communities where we work and live. We contribute substantially to local charities and initiatives, but aim to have a more robust strategy in the future maximising impact and growth opportunities for all.

InterGen's Headquarters in Edinburgh, UK

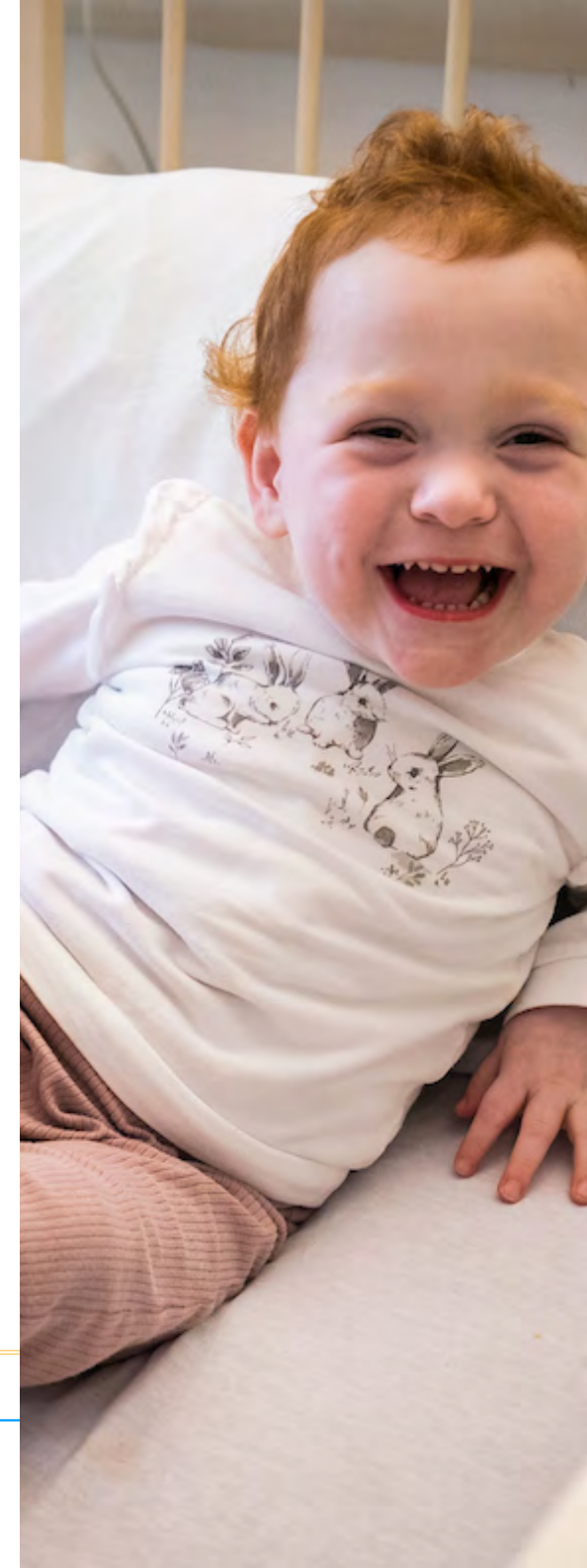
Our contribution to local communities is integral for our success. Some of our charitable partners in Scotland include:

Children Hospices Across Scotland, a charity offering full family support services for babies, children and young people with life shortening conditions.

Maggie's, an independent help source for those diagnosed with cancer. Based in Edinburgh, it provides both physical and mental support to its patients

The Yard, a Scottish charity supporting disabled children, young people and their families through adventure play. Offering play experiences in specially designed and supporting environments.

Edinburgh Children's Hospital Charity, supports the Royal Hospital for Children and Young People, as well as other children's healthcare settings across Scotland. We have been supporting this organisation since 2020



Areas of Impact



In addition to our financial contributions to charitable causes, we encourage each of our plants to contribute to the development and wellbeing of local communities in their own unique ways. Some examples of contributions include:

Rocksavage (UK)

- In 2020 we lit up our cooling towers blue to show support for the NHS as part of the clap for the NHS initiative.
- In 2019 we funded a defibrillator for the Weston community.

Spalding (UK)

- We work with local schools in the community to teach young people about electricity generation using fun-filled initiatives. Supported by our visitor programme which allows schools to attend site tours of the power plant.
- Our Lincolnshire Road Safety Partnership aims to teach people, especially young drivers, the dangers of unsafe driving. The purpose and ambition of our partnership is to reduce the deaths on Lincolnshire roads, where it has historically been high.

Coryton (UK)

- David Evans has been running a school education programme on behalf of InterGen, part of this includes science workshops. Read more in the case study.

Millmerran (Australia)

- Working closely with the Queensland Resources Council, Energy Academy and Queensland Government to deliver education programmes for high school students in 2019.
- Dedicated annual budget to support local community groups within the local area.
- Sponsored Life Flight, a helicopter service that delivers emergency evacuation services to seriously injured and ill people.



InterGen Schools Workshops

David Evans, spent several years as a teacher. When he taught in mainstream education, he was passionate about STEM (Science, Technology, Engineering and Mathematics) projects.

Since 1999, David has been delivering InterGen Schools' Workshops to primary schools with a strong STEM bias. The first workshops were delivered around Rocksavage Power Station and subsequently in the areas of Spalding Energy and Coryton Energy. Each year workshops are delivered on a part time basis. So far over 33,000 young people have been involved in over 1,300 workshops.



Since inception the workshops have continued to evolve and include elements of:

- Electrical Safety and The Uses of Electricity
- Simple and More Complex Circuits
- Controlling Electricity with Switches
- Resistance, Forces and Magnetism
- The Generation of Electricity
- Simple Machines
- Why Engineers are Important
- What Engineers Do with Particular Reference to InterGen
- Careers for Engineers

The programme has been on hold due to COVID-19, but will start again soon. We are also exploring online workshops to blend with school visits.

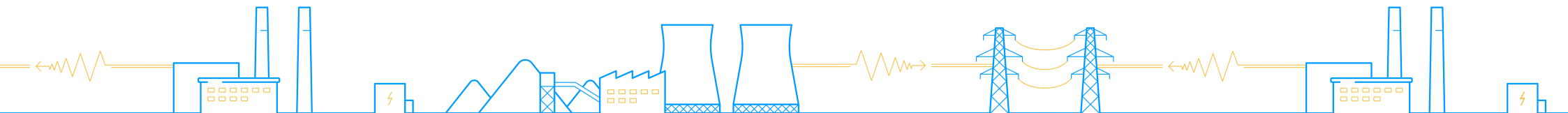
Areas of Impact



Addressing local concerns

To ensure we act as a good neighbour and address any local concerns, we operate a formal grievance procedure, where we address all the concerns raised by the public. Due to the nature of our work, a particular challenge we face from our surrounding communities is around noise and pollution control, we therefore ensure that these particular areas are a focus for our local plant managers.

In the unfortunate event we receive a complaint, we follow our grievance procedure which covers the process and required action when receiving a grievance and ensures a coherent approach across all sites. These grievances are then logged on our internal system to ensure they have been followed up.





Acting as a responsible business

Electricity is part of society's critical infrastructure and the stability and fair pricing of electricity supply is critical, as such the sector is highly regulated. Any interruption can have potentially deep economic and safety consequences and proper risk management is required. Disruptions can occur for a number of reasons. Systems are at risk of operational disruptions to supply, such as plant failures or outages, but there is also an increasing focus on cyber attacks. We have experts ensuring our systems are secure, resilient and can adapt if risks emerge.

InterGen is working with policymakers, regulators and system operators across the electricity value chain to assess and mitigate risks as they emerge and to ensure the stability of the grid. The importance of effective markets to reduce or stabilise pricing is also key.

We comply, at all times, with all applicable laws and regulations and refrain from any activity or arrangement which is illegal, unethical, or would endanger the safety of others. This includes any payments for illegal acts, indirect contributions, rebates and bribery. We do not permit any activity that fails to meet our strict commitment to integrity in all facets of our business. All business conduct should be well above the minimum standards required by law.

We only associate and engage in business activities with those persons or entities that share the same high ethical standards.

InterGen shareholders have decision making capacity and responsibility to help make business decisions. They exercise their responsibility via the appointed Supervisory Board (the members of which are appointed by our shareholders). A key area over which they have responsibility is business growth and major capital expenditure.

There are also sub-committees that own particular topics. These include:

- The Audit and Risk Committee, which monitors the effectiveness of our risk management policies (including those pertaining to market risk and cyber risk) and its compliance with legal and regulatory requirements.
- The HSSE Committee, which has oversight of our policies, management systems and performance with respect to HSSE – this is largely focussed on plant safety, but also includes spillages and any other environmental issues.
- The Compensation and Benefits Committee are involved in our employee policies, including reviewing and approving incentive schemes.
- The Business Steering Committee has oversight of the business operation, including plant metrics, plant efficiencies and and its financial performance.



Areas of Impact



Governance and Compliance

Our Code of Conduct translates our core values into behavioural standards and sets out fundamental principles of business conduct expected from InterGen's management, officers, employees, business partners, suppliers, contractors and agents. To ensure we uphold the expectations set out in our Code of Conduct, we ensure that all members of staff complete mandatory Code of Conduct training on an annual basis.

At InterGen, we take compliance very seriously and have policies in place to support us.

In 2016, we had a compliance issue in the UK that resulted in a penalty from the UK Energy regulator, Ofgem in 2020. This issue had a profound impact on our business and we are committed to ensuring that it doesn't happen again.

Jim Lightfoot, InterGen CEO, said: "We deeply regret and sincerely apologise for the behaviour of former traders in these 2016 incidents. We take this matter incredibly seriously and have cooperated with Ofgem's investigation. None of the traders involved in 2016 are still with the company."

"As acknowledged by Ofgem we have undertaken a thorough overhaul of our people, processes and systems since 2016, so that nothing like this happens again. This has included detailed compliance training, strengthened management oversight processes, an

internal restructuring, and experienced hires being made to the trading desk."

"InterGen is proud to have been an important part of Britain's power system for more than 20 years. We apologise again for these historic incidents and look forward to continuing to help the UK keep the lights on and transition to a net zero economy."

Read more about the [Ofgem penalty](#).

Responsible Procurement Practices

We are committed to conducting our global business to the highest ethical and legal standards.

Ethical procurement

Our Procurement and Anti-Corruption policies set out the parameters for InterGen's procurement of goods and services, including compliance with legislation and industry standards such as the Bribery Act 2010 (UK), Modern Slavery Act 2018 and Foreign Corrupt Practices Act 1977. This also supports InterGen's commitment to integrity, one of our core values, and is to ensure procurement of all goods and services is conducted in an honest, competitive, fair and transparent manner that demonstrates a fit for purpose solution and value for money, whilst protecting the reputation of InterGen.

Raising concerns

As part of our commitment to ethical behaviour, we operate an Integrity helpline as an intake and reporting channel for employees who have questions about a business issue or who wish to report a concern about potential wrongful conduct. This multilingual, confidential and anonymous toll-free service is available to all employees 24 hours a day, 7 days a week and 365 days a year.

Modern slavery or human trafficking prevention

As part of ongoing efforts to not only align with local legislation, but to go above and beyond, we ensure a robust risk-based supplier assessment and on boarding process when working with new suppliers. This includes a requirement that they have and enforce suitable anti-slavery and human trafficking policies.

Conflict of interest

Conflicts of interest can arise any time a director, officer or employee faces a choice between a personal interest (financial or otherwise) and the interest of InterGen. InterGen's Code of Conduct clearly explains that conflicts of interest may arise, and employees are encouraged to be aware of how their actions might be perceived — including by suppliers, partners and neighbours in local communities.

To continually improve, we conduct regular anti-slavery and human trafficking risk assessments of our business and supply chains. We frequently review our policies and procedures and update our Code of Conduct. We also emphasise the importance of our Integrity Helpline.

Areas of Impact



Tax Compliance

Integrity is one of InterGen's core values and we are committed to ensuring that we are compliant with all applicable international tax laws, rules, regulations and reporting requirements. We structure our commercial activities to ensure they are optimum from a legal, financial, tax and treasury perspective. While tax is one of a number of factors that is considered when undertaking business transactions, we do not undertake transactions primarily for tax planning purposes.

InterGen recognises the importance of the role it fulfils as both a collector and payer of taxes. We strive to have an open, transparent relationship with the Tax Authorities in the jurisdictions in which we operate. We deliver our obligations on a timely and accurate basis, conducting our tax affairs in accordance with our published [Tax Strategy](#).



“The Energy sector has increasingly become a target of cyber attacks. At InterGen cyber security is a top priority and our team have been actively working with government, regulators and the wider industry to ensure we are aware of emerging threats and that our systems and data is secure. Raising awareness across the organisation is one of the best defences, so the implementation of a robust training plan is key.”

Lisa Mackay
Commercial Director

Cyber Security & Data Protection

As part of our risk management approach to governance, we have systems and processes to ensure that we secure and protect our employee and customer data, to avoid reputational and personal damage. Cyber risks are increasing for organisations around the world, and ensuring our intellectual property and intelligence are protected is key to underpinning our long-term success.

Alongside following national regulatory requirements for cyber and data protection, we deploy our own measures to add an extra layer of security. Some of these measures include:

- Data security barriers, such as, perimeter and endpoint protection, web and email filtering, and no admin rights for users on endpoints
- Investment into third party 24/7 network monitoring
- Ensuring that all staff complete our compulsory Cyber Security Awareness Training
- Conducting Phishing Attack simulations to test to the robustness of our data protection

InterGen are also Cyber Essentials Plus certified, and we continue to work on the response and recovery areas (business continuity and disaster recovery) to improve processes and operational recovery.

General Data Protection Regulation (GDPR)

General Data Protection Regulation (GDPR) was implemented by the European Union in 2018 and applies to all organisations holding data of UK and EU citizens. To ensure adherence, InterGen have a GDPR policy, outlining InterGen's organisational and employee requirements. We take GDPR seriously, but it is not a high risk area for us given the very limited amount of data we process.

Additionally, InterGen has a data privacy contract with our employees and a privacy notice on our website.



Concluding Statement

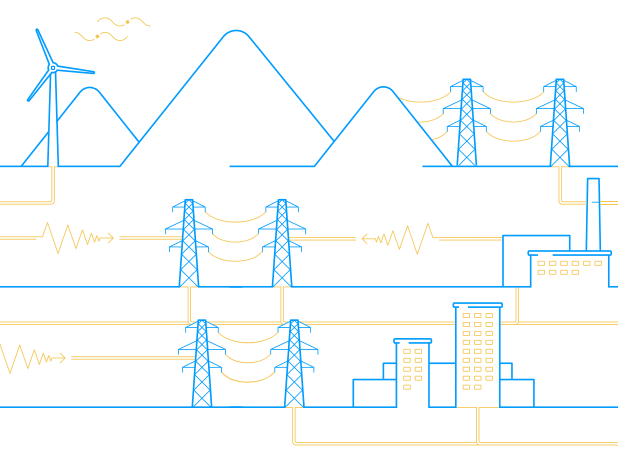
We will continue to ensure we operate a safe, reliable and innovative business and will sharpen our focus on ESG topics as we grow and evolve. We will pursue opportunities to invest in our existing sites to provide flexible energy solutions and the related services needed by our customers and system operators, now and for generations to come.

Innovation, research and development remain priorities as we commit to achieving improvement across all of our ESG goals. We are a focused and fit for purpose organisation and take pride in delivering stability for our customers. We truly believe that our people are our greatest asset and we will continue to ensure that InterGen is a rewarding place to work.

Stakeholder engagement

We take pride in managing our business in a way that ensures returns not only to our shareholders, but to all our stakeholders, including our employees and the communities surrounding our assets.

We engage with our stakeholders through a range of channels.



Stakeholder	Why are they important to us?	How we engage
Employees	We believe that our employees are our greatest asset. We encourage and value feedback, provide competitive compensation and benefits as well as training. Our success in the energy transition is reliant on our team effort.	We have an internal communications strategy to ensure that employees have access to the right information and can share their opinions or ask questions.
Communities	Being great neighbours is part of who we are. We are fundamentally connected to each other, and this gives meaning to what we do. We ensure our commitment to actively engaging with our communities is central to our strategy.	We consider our impact on our communities carefully – environmentally and socially. We actively invest in charities and we have public exhibitions in the communities adjacent to our facilities when we need their input at key decision points. This could be for initial developments, expansions or significant changes including accessing new mine leases.
Shareholders	They choose to invest in our business and we value their vote of confidence. They also help steer our strategic path and decision making.	We engage in numerous ways with shareholders in the form of direct calls to the senior executives of our investors, various meetings on specific topics with both individual shareholders and groups. We also discuss performance reports and work collaboratively on growth projects. Informal meetings and engagements to build relationships and formal Supervisory Board and Shareholder Meetings.
Government / Regulators	Our business is privately owned. Our primary businesses are in the UK and Australia. We adhere to all legal in these countries. Our role in the energy transition is vital, and as that requires government involvement maintaining strong relationships is critical to success. We aim to collaborate and share experiences with peers and industry organisations to help support the energy transition.	We have regular bilateral meetings with UK government departments, the regulator Ofgem and National Grid and the Committee on Climate Change – discussing a broad range of subject but focussed on security of supply. In Australia, we actively participate in technical working groups led by the National Electricity Market (NEM) governing bodies Australian Energy Market Operator (AEMO) and the Australian Energy Regulator (AER) respectively.
Industry	Providing context and keeping up to date with developments and legislation is key in the fast-paced energy market.	Our people are on the Board of Energy UK, the key industry trade association. We also sit on several committees within Energy UK (and chair one of them). In Australia we are a member of the Australian Energy Council, the industry body representing generators operating within the National Electricity Market (NEM).