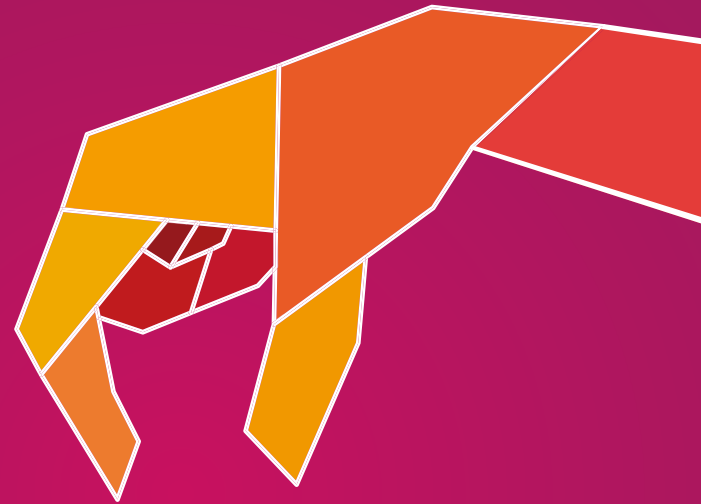
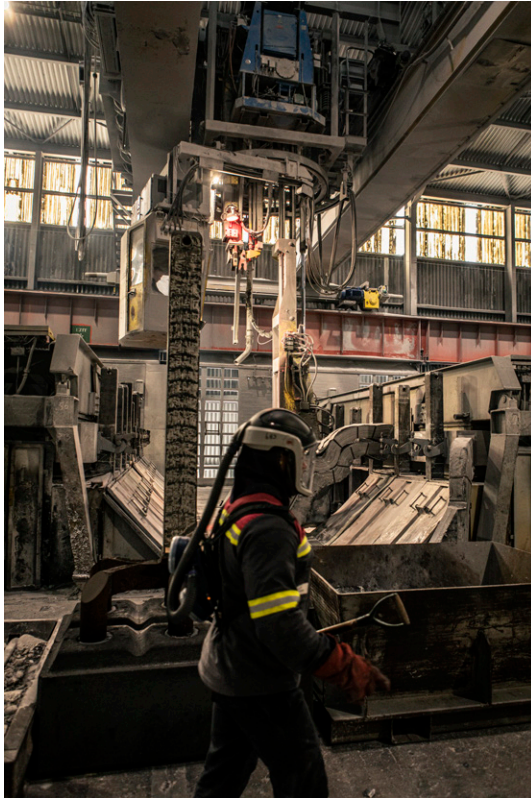


# ALVANCE BRITISH ALUMINIUM SUSTAINABILITY REPORT





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*2025 was another important year for Alvalce British Aluminium.*

*We continued to build on the strengths of Lochaber while investing in our people, improving how we manage our environmental impacts and supporting the long-term future of the business.*

## MESSAGE FROM THE MANAGING DIRECTOR.

Dear Colleagues, Partners, and Community,

There is a lot we can be proud of. We recorded our highest-ever number of apprentices on site and were recognised by Make UK for Developing Future Talent. We also continued to strengthen process safety, responsible sourcing, and environmental management, alongside our contribution to the local community.

Not everything moved in the right direction. Our health and safety performance during 2025 was not where we want it to be, and our carbon emissions increased during the year. We need to be open about those results, understand what is driving them and act on what we learn. Our aluminium does, however, remain significantly lower in carbon intensity than the global industry average, supported by the renewable hydroelectric power available here at Lochaber.

For me, sustainability is about making sure this business has a strong future. That means operating safely and responsibly, developing the skills we need, using our resources efficiently and continuing to be a positive part of the community in which we operate.

As we look ahead, our focus is clear: learn from our performance, strengthen our controls, reduce our environmental impact, and continue investing in our people and our site.

Thank you to everyone across the business, and to our partners and community, for your continued contribution and support.

Tom Uppington  
Managing Director  
Alvalce British Aluminium



## OPERATIONAL OVERVIEW

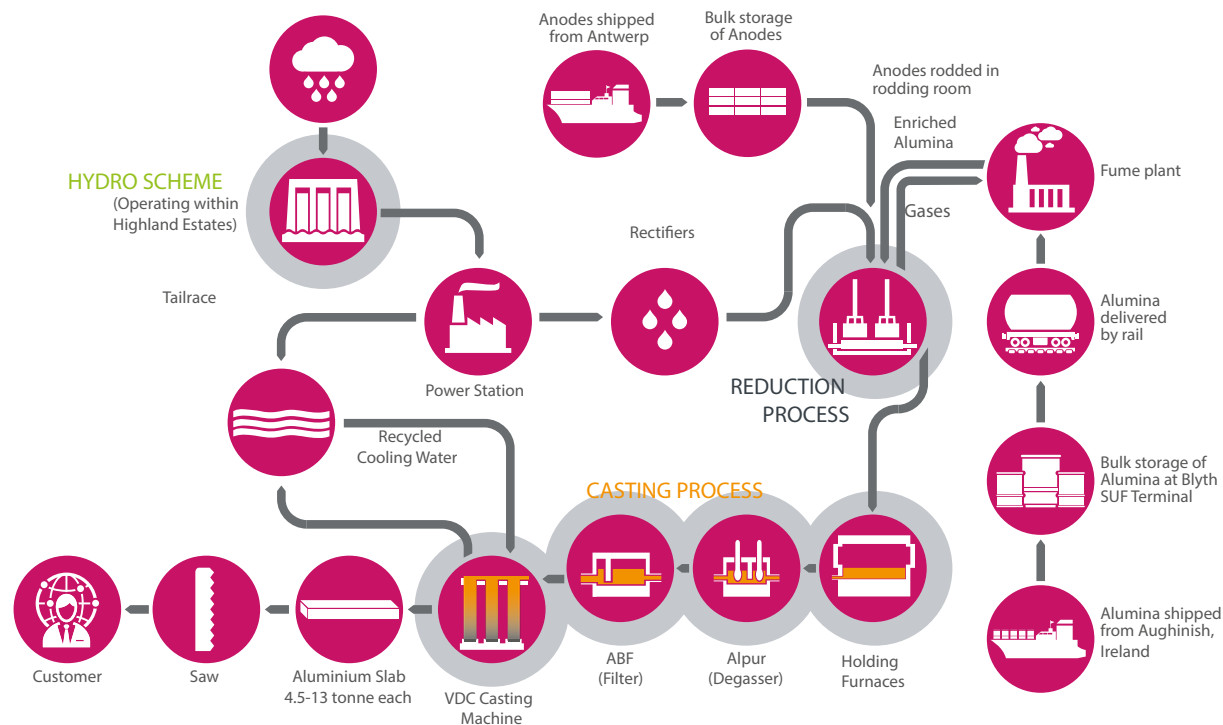
### BUSINESS CONTEXT

The Lochaber smelter, operated by Alvalance British Aluminium Ltd, is a primary aluminium smelter located approximately 2 km north-east of Fort William. The site has the capacity to produce approximately 48,000 tonnes of cast aluminium each year.

Primary aluminium is produced through the electrolysis of alumina using carbon anodes and electricity. Most of the electricity used by the smelter is supplied by the neighbouring hydroelectric power station, operated by SIMEC Lochaber Hydropower Ltd, with electricity imported from the national grid where required. A more detailed overview of the production process is provided in the process flow diagram.

The smelter operates alongside SIMEC Lochaber Hydropower Ltd and JAHAMA Highland Estates, which manages surrounding land and infrastructure. The close relationship between aluminium production, renewable electricity generation and estate management creates a distinctive industrial setting with strong links to the local economy and community.

As one of the area's major employers, we recognise that our responsibilities extend beyond production. We have an important role in supporting local employment, skills development and the long-term economic and social resilience of the region.



### PRODUCTION SUMMARY

**29,977**  
Tonnes of aluminium slab

**2,094**  
Tonnes of aluminium sow pans

**93.75%**  
Current efficiency

**12,509**  
Anodes cast for production

**99.1%**  
Delivery On Time In Full (OTIF)

**1**  
Customer complaint

# VISION, MISSION AND VALUES.

**PURPOSE:** TRANSFORMING HIGHLAND POTENTIAL INTO SUSTAINABLE GROWTH.

**MISSION:** PRODUCE GREEN ALUMINIUM AND ELECTRICITY FOR CUSTOMERS NEAR AND FAR BY HARNESSING THE STRENGTH OF HIGHLAND POTENTIAL.

**VISION:** TO CREATE A SUSTAINABLE FUTURE FOR OUR PEOPLE AND ENVIRONMENT THROUGH THE GROWTH OF OUR BUSINESS.



ALVANCE BRITISH ALUMINIUM'S HYDROPOWER OPERATION MAKES THE SITE ONE OF THE GREENEST METAL PRODUCTION PLANTS IN THE WORLD AND OUR GUIDING VALUES MAKES ALVANCE UNIQUE IN OUR APPROACH TO BUSINESS.

VALUES:



CHANGE



FAMILY



SUSTAINABILITY

## ENVIRONMENT

The Lochaber smelter produces lower-carbon primary aluminium using electricity supplied predominantly by locally generated hydroelectric power. This significantly reduces the carbon intensity of production compared with smelters reliant on fossil-fuel-based electricity generation. We continue to manage emissions to air, water and land through our environmental management system, operational controls and investment in plant and infrastructure. Material efficiency is supported by remelting internal aluminium scrap and recovering or recycling process materials where practicable. Water discharged following hydroelectric generation is also used within the smelter's cooling processes before being returned to the wider water system. This integrated approach reduces the need for separate water abstraction and makes effective use of the resources available across the Lochaber operations.

## SOCIAL

As a major employer in the Highlands, we are committed to providing safe and sustainable employment and contributing positively to the communities around us. We support local organisations and initiatives through employee-led activities, community partnerships and charitable support. We also invest in apprenticeships, training and workforce development, while working with schools and other organisations to promote science, technology, engineering and mathematics careers. These activities help develop future skills, provide local career opportunities and support the longer-term resilience of the regional economy.

## ECONOMIC

Access to locally generated hydroelectric power is central to our operating model, supporting lower-carbon aluminium production, reducing exposure to energy market volatility and strengthening long-term competitiveness. We also focus on resource efficiency by reducing waste, recovering valuable materials and reusing process by-products where practical.

## GOVERNANCE FOR SUSTAINABILITY



### MANAGING RESPONSIBILITY

Responsibility for sustainability is integrated into the established management arrangements of Alvalance British Aluminium.

The Managing Director and senior management team are accountable for the environmental, social and governance matters relevant to the business. Departmental managers are responsible for managing the impacts and risks associated with their activities, supported by the HSEQ and Sustainability function and other specialist functions across the business.

Environmental, social and governance considerations form part of operational planning, risk management, investment decisions, workforce planning and legal compliance.

Performance, risks and improvement actions are reviewed through regular management meetings, formal management review, internal audit and external assurance.

During 2025, management oversight included environmental and regulatory performance, health and safety, process safety, workforce capability, responsible sourcing, carbon reporting and the completion of audit and inspection actions.

*Copies of our policies can be found on our website:*

*Legals | ALVANCE British Aluminium*

### OUR STRATEGY

#### WORKING PRINCIPALS

The Alvalce Working Principles set out the standards of behaviour expected across the business. They cover how we treat one another, work with customers and suppliers, protect health and safety, manage environmental responsibilities and conduct business with integrity.

These expectations are supported by company policies, management accountability, employee training and confidential routes for raising concerns. Employees are expected to act honestly, treat others with respect and raise concerns where conduct does not meet the standards expected by the business.

No confirmed material breaches of the Working Principles or other ethical-conduct requirements were recorded during 2025.

No confirmed cases of bribery or corruption were recorded during 2025.



#### ANTI-BRIBERY & CORRUPTION

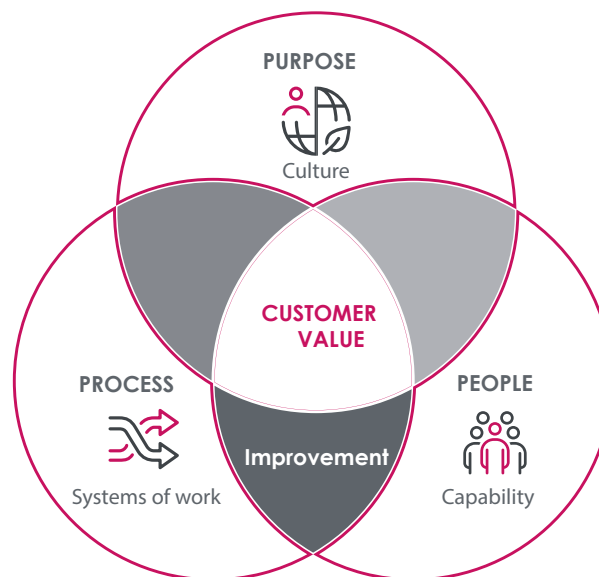
Alvalce British Aluminium does not tolerate bribery or corruption in connection with its business activities.

Our approach is supported through:

- Mandatory anti-bribery and corruption training;
- Financial controls and approval arrangements;
- Internal review and audit; and
- Confidential channels for reporting concerns.

At the end of 2025, 100% of employees required to undertake anti-bribery and corruption training had completed it.

No confirmed cases of bribery or corruption were recorded during 2025.



ETHICAL PRACTICE

PAYMENTS TO GOVERNMENT

As part of our commitment to transparency and economic responsibility, we publicly disclose our payments to governments. This disclosure is part of our adherence to the Aluminium Stewardship Initiative (ASI) requirements and our dedication to maintaining open and honest communication with our stakeholders. The table below provides a detailed breakdown of our payments to the government for the year 2025.

| Payments to UK Government 2025                                    | £            |
|-------------------------------------------------------------------|--------------|
| Employers payroll taxes and National Insurance                    | 483,794.18   |
| Property tax                                                      | 765,658.00   |
| Taxes collected on behalf of employees and remitted to Government | 1,519,558.89 |
| Total                                                             | 2,769,011.07 |

These payments reflect our contribution to the economy through various taxes and obligations, underscoring our role as a responsible corporate citizen.

POLITICAL CONTRIBUTIONS

We do not make political donations. Our decisions are grounded in sustainable business growth, not influenced by political interests. Where interaction with political bodies is required, it is conducted transparently and lawfully, in line with our ethical values.

OUR STRATEGY

RISK AND COMPLIANCE OVERSIGHT

The business operates within a range of legal and regulatory requirements covering environmental protection, major-accident hazards, occupational health and safety, product quality, energy and carbon reporting, employment and corporate conduct.

Applicable requirements are managed through the Integrated Management System, supported by defined responsibilities, legal compliance review, risk assessment, operational controls, audit and corrective-action processes.

The site maintains regular engagement with its principal regulators, including the Scottish Environment Protection Agency and the Health and Safety Executive. Regulatory inspections, audit findings and other compliance matters are reported to the appropriate managers, with actions assigned and tracked to completion.

During 2025, SEPA completed two inspections of the site. No permit non-compliances were identified during either inspection, although areas requiring further work were identified and incorporated into the site's improvement arrangements.

Material environmental incidents, permit breaches and health and safety performance are reported separately in the relevant sections of this report.

CERTIFICATES & ASSURANCE

INTEGRATED MANAGEMENT SYSTEM

Alvance British Aluminium operates an Integrated Management System certified to:

- ISO 9001:2015 for quality management;
- ISO 14001:2015 for environmental management; and
- ISO 45001:2018 for occupational health and safety management.

The management system provides a common framework for managing risks, setting objectives, controlling operations, evaluating compliance and supporting continual improvement.

The 2025 external surveillance audit identified no major non-conformances, two minor non-conformances and 10 observations.

| ISO audit outcome      | 2025 |
|------------------------|------|
| Major non-conformances | 0    |
| Minor non-conformances | 2    |
| Observations           | 10   |

The minor non-conformances related to maintenance tracking across the Hydro Scheme, the corrective actions were in progress at year-end.

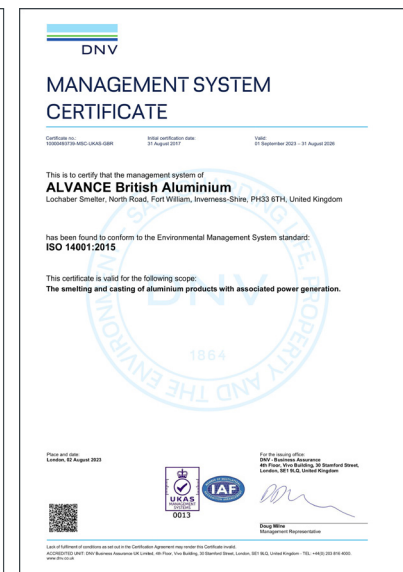
## CERTIFICATIONS & ASSURANCE



NATIONAL MANUFACTURING DAY 2025 AT NO.11  
DOWNING STREET WITH MAKE UK



MAKE UK AWARDS 2025 IN LONDON - NORTH  
WEST REGIONAL TITLE FOR 'DEVELOPING FUTURE  
TALENT'



## ALUMINIUM STEWARDSHIP INITIATIVE

Alvalence British Aluminium remained certified to the Aluminium Stewardship Initiative Performance Standard V3 throughout 2025.

No ASI audit took place during the reporting year. Activity focused on maintaining the management arrangements and evidence required to support certification and preparing for recertification in 2026.



# SUPPLIER PRE-QUALIFICATION

Our supplier pre-qualification process assesses the capability, financial standing and responsible business practices of suppliers before they are approved to work with Alvalde British Aluminium.

During 2025, the process was revised so that sustainability and responsible business questions form part of the assessment for all suppliers completing pre-qualification, rather than being applied only to identified key suppliers. The assessment covers:

- Governance and legal compliance
- Ethical policies and business conduct
- Quality management
- Environmental management and performance
- Health and safety
- Supply-chain management
- Insurance and financial standing
- Acceptance of contractual terms

Governance and compliance carries the greatest weighting within the assessment, accounting for 25% of the overall score. This includes evidence of policies and controls relating to bribery and corruption, child and forced labour, non-discrimination, health, safety and environmental management, legislative compliance and the handling of grievances.

The required pass score is tiered according to supplier type.

Key suppliers are subject to the highest threshold, followed by other product and service providers, with a proportionate threshold applied to sole traders. This recognises differences in supplier size and capability while maintaining minimum standards for ethical conduct, compliance and responsible business practice.

Where a supplier does not achieve the applicable threshold, further evidence or improvement action may be required. Any decision to proceed below the defined threshold must follow the documented dispensation process, with the reason recorded and approval from Procurement and HSEQ.

During 2025, 65 suppliers completed the revised pre-qualification assessment, and no suppliers were approved through the formal dispensation process.

## RESPONSIBLE SOURCING

In addition to general supplier pre-qualification, we undertake due diligence on relevant raw-material supply chains. This includes considering the origin of key materials and the potential exposure to conflict, serious human-rights abuses, corruption and other responsible-sourcing risks.

Our approach supports the responsible-sourcing requirements applicable to our Aluminium Stewardship Initiative certification and London Metal Exchange-listed brands.

During 2025, our review of the upstream alumina supply chain identified bauxite originating from Guinea, Brazil and Jamaica. This information provides greater visibility of the geographical origin of one of our most significant raw materials and informs our ongoing responsible-sourcing assessment.

The responsible-sourcing process remained broadly unchanged during the year. Further assurance activity is planned for 2026, including an audit of our alumina supplier to provide greater understanding of upstream sourcing arrangements, controls and supporting evidence.

We have also identified the need to improve the way supply-chain sustainability information is collected, assessed and maintained. During 2026, we are investigating digital and AI-enabled tools that could improve supply-chain visibility, support sustainability and responsible-sourcing assessment and provide a more systematic approach to identifying and managing supplier risk.

This work will also support our wider aim of improving the availability and quality of environmental, carbon, social and responsible-sourcing data from suppliers.



# OUR DEDICATION TO OUR PEOPLE

8 DECENT WORK AND ECONOMIC GROWTH

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

11 SUSTAINABLE CITIES AND COMMUNITIES

17 PARTNERSHIPS FOR THE GOALS

## SOCIAL RESPONSIBILITY

We believe business success should create value beyond profit. Our social responsibility strategy focuses on positively impacting the people we employ and the communities we're part of and creating shared value through safety, inclusion, opportunity, and engagement.



OUR FOCUS AREAS

Our investment in future skills was recognised during the year when Alvanco British Aluminium received the Make UK Manufacturing Award for Developing Future Talent for the North West Region.

Our social priorities are:

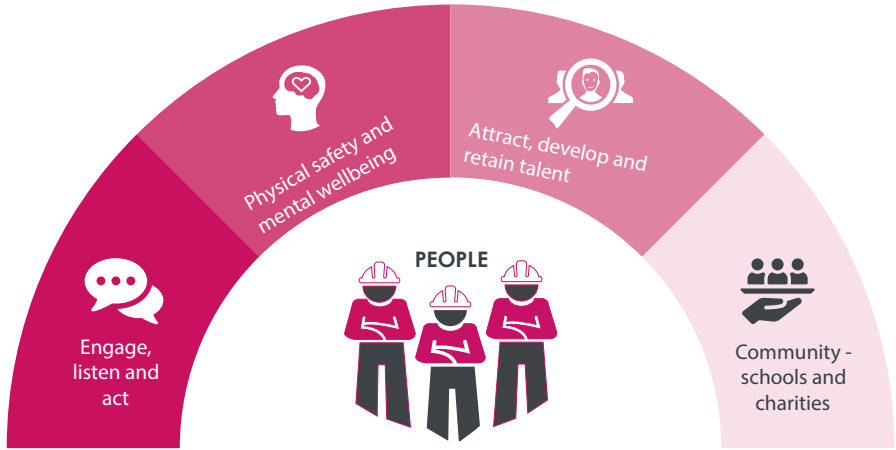
- Health, safety and well-being;
- Employee engagement and participation;
- Equality, diversity and fair pay;
- Human rights and fair labour;
- Skills development and future talent; and
- Community and social value.

OUR PEOPLE & SOCIAL APPROACH

As one of the largest private-sector employers in Lochaber, Alvanco British Aluminium has an important role in supporting skilled employment, workforce development and the long-term resilience of the local community.

Guided by our values of Change, Sustainability and Family, our social approach focuses on providing safe and fair employment, developing future skills, supporting equality and inclusion, respecting human rights and contributing positively to the communities around us.

Developing local skills and creating meaningful opportunities for future generations remains particularly important. In 2025, we recorded our highest-ever number of apprentices on site, while more than one in five employees had begun their careers through an apprenticeship route. Alongside apprenticeships, we continued to support graduate development, mentoring and higher and postgraduate education.



### ENABLING PERFORMANCE:

Protecting the health and safety of employees, contractors and others affected by our activities is a fundamental responsibility.

Our occupational health and safety arrangements form part of the site's ISO 45001-certified Integrated Management System. They include risk assessment, operational controls, competency and training, incident investigation, employee consultation, occupational health support and internal and external assurance.

Employees and contractors are expected to stop work where conditions are not safe and to report hazards, near misses and concerns so that action can be taken before harm occurs.

### 2025 PERFORMANCE SUMMARY

#### INCIDENT REVIEW

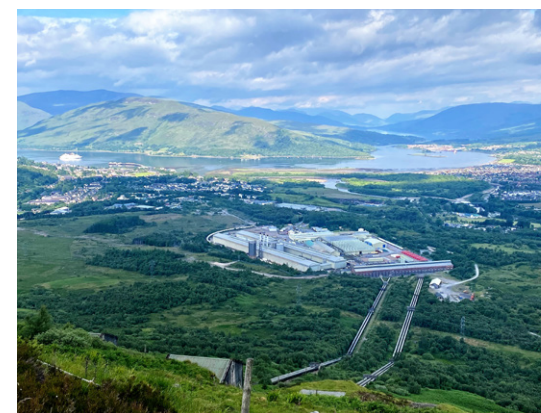
- In 2025 the business had a total of 8 work related injuries:
- 2 x Lost Time Injuries (LTI)
- 0 x Restricted Work Injuries
- 1 x Medical Treatment Injury
- 3 x First Aid

The two Lost Time Injuries involved a back strain and a broken ankle, and the Medical Treatment Injury followed a fall at level.

The increase in injuries compared with 2024 was disappointing and reinforced the need to maintain focus on critical controls, operational discipline and learning from incidents.

Additionally, seven near-miss incidents were classified as critical under our internal reporting arrangements during 2025. These included incidents involving lifting equipment, electrical systems, molten metal and other safety-critical plant. Four were reportable as dangerous occurrences under RIDDOR.

All significant incidents are investigated to identify immediate and underlying causes, with corrective actions assigned and tracked through the site management system.



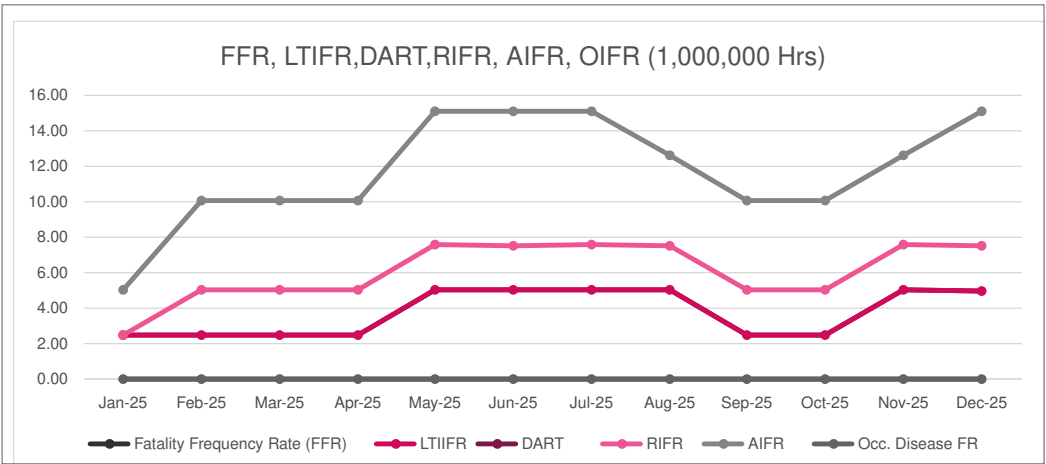
# INDUSTRY BENCHMARKING

We participate in European Aluminium’s annual safety statistics programme, contributing health and safety performance data alongside other aluminium producers across Europe. This provides an important external benchmark for our performance and allows us to compare key indicators against other primary aluminium operations.

The latest available European Aluminium dataset relates to 2024 and includes safety performance from 20 primary aluminium plants across Europe, representing more than 18 million working hours.

During 2025, our Lost Time Injury Frequency Rate was 5.01 per million hours worked, while our Recordable Injury Frequency Rate was 7.52 per million hours worked.

We use this external benchmarking alongside our own year-on-year performance to identify trends, understand common industry risks and inform improvement priorities. While benchmarking provides useful context, our focus remains on preventing injuries, strengthening critical controls and learning from incidents across the site.



## OUR COMMITMENT

Process safety remains a key priority at Lochaber and is fundamental to protecting our people, neighbouring communities and the environment, while supporting the long-term resilience of the site. As an Upper Tier COMAH establishment, we maintain a strong focus on the effective management of major accident hazards. Our approach centres on understanding those hazards, maintaining effective controls and identifying opportunities for improvement before issues can escalate.

### 2025 KEY PROGRESS &

#### PROCESS SAFETY PERFORMANCE

No Tier 1 process safety events were recorded in 2025, continuing our strong performance in preventing the most serious types of incidents. Tier 2 events also reduced by 50% compared with 2024, while overall higher-consequence event performance remained stable.

#### PROACTIVE HAZARD IDENTIFICATION

Tier 4 process safety reporting increased by 48% compared with 2024, marking a third consecutive year of growth since the introduction of the formal Process Safety Management System and a 112% increase since 2022. Overall process safety reporting increased by 34%, with the number of employees contributing reports also rising by 20%.

This continued growth in reporting, alongside stable higher-consequence event performance, reflects stronger workforce engagement and a more proactive approach to identifying and addressing potential issues before they can escalate.

#### MAJOR ACCIDENT HAZARD ASSURANCE

Our programme of process safety assurance activities continued throughout 2025, providing regular assurance of the controls used to prevent and mitigate major accident hazards.



Findings are used to identify improvement opportunities and support the continued effectiveness of critical controls across the site.

#### PROCESS HAZARD REVIEWS

Structured process hazard reviews were completed during 2025 to assess operating risks, review existing safeguards and identify opportunities for further improvement. Actions arising from these reviews are being progressed through established site management processes.

#### LEARNING & CONTINUOUS IMPROVEMENT

We expanded our review of relevant process safety incidents from across industry during 2025. Lessons from external events are used to challenge our own arrangements, identify opportunities for improvement and strengthen process safety awareness across the site.

#### FUTURE OUTLOOK

In 2026, we will continue to strengthen process safety through proactive reporting, assurance of critical controls, structured risk assessment, Human Factors studies and learning from internal and external events.

Our focus will remain on preventing significant process safety events, identifying emerging risks early and strengthening leading indicators and critical control assurance, while continuing to develop our Process Safety Management arrangements as part of our commitment to safe and sustainable operations.

## OUR APPROACH



### PROTECTING HUMAN RIGHTS ISN'T PASSIVE - IT'S A DAILY COMMITMENT TO FAIRNESS, DIGNITY, AND TRANSPARENCY ACROSS EVERYTHING WE DO.

We respect internationally recognised human and labour rights and expect employees, contractors and suppliers to operate in accordance with applicable employment and ethical standards.

This approach is embedded across our governance structure, supplier relationships, workforce practices, and stakeholder engagement.

#### MODERN SLAVERY & ETHICAL LABOUR

Our Anti-Slavery Policy prohibits forced labour, servitude, human trafficking and child labour. Human-rights and ethical-labour expectations are also incorporated into our procurement and supplier pre-qualification arrangements.

#### DURING 2025:

- No confirmed cases of modern slavery, forced labour or child labour were identified;
- No material employment-rights breaches were identified; and
- Sustainability and ethical-business requirements were strengthened within supplier pre-qualification.

Further information on supplier standards and responsible procurement is provided in the Governance section.

#### WHISTLEBLOWING & REPORTING CONCERNS

Creating a safe environment where employees and stakeholders can raise concerns is essential to our ethical framework.

Our Whistleblowing Policy provides:

- Multiple internal and external channels for raising issues.
- Anonymous reporting via hotline and email.
- Protection from retaliation for all whistleblowers.

*In 2025, no whistleblowing reports were received.*

We continue to promote awareness and trust in our reporting mechanisms.

#### REWARDS & BENEFITS

Our employment offering includes salary and applicable shift arrangements, company and individual bonus schemes, pension contributions, private healthcare support, Cycle to Work and employee discount and benefits arrangements.

These arrangements form part of our wider approach to attracting, supporting and retaining the skills required by the business.



DIVERSITY FUELS  
PERFORMANCE -  
INCLUSION MAKES IT  
SUSTAINABLE.

OUR COMMITMENT

We aim to provide a workplace where employees are treated fairly and have access to employment, development and progression opportunities without discrimination.

Our approach is supported through recruitment and employment policies, equality and inclusion training, flexible-working arrangements where appropriate and support for employees with family and caring responsibilities.



Alvalance & JAHAMA Senior Management Team

2025 PROGRESS

- Women made up 16% of our total workforce in 2025.
- 50% of our senior site management team were women.



We continue to improve access and equity through:

- Fair, transparent recruitment processes.
- Inclusive job advertising and flexible work options.
- Supportive parental leave policies.

Inclusion training is mandatory across all teams and delivered through our online ‘Astute’ platform, helping embed awareness and accountability across the business.

VOLUNTARY GENDER PAY GAP

During 2025, a voluntary gender pay gap review was completed across Alvalance British Aluminium, SIMEC Lochaber Hydropower and JAHAMA Highland Estates.

The review used a snapshot date of 2 May 2025 and covered 201 employees: 169 men and 32 women.

Both mean and median hourly pay were higher for women across the reporting population. Women were represented across all four pay quartiles, including 16% of the upper quartile, broadly consistent with their overall representation in the workforce included in the review.

All men and women within the reporting population received a bonus during the relevant period.

Gender pay gap analysis measures differences in average pay across a workforce and does not assess whether individuals receive equal pay for the same or equivalent work.

We will continue to review pay and bonus outcomes annually.

| Gender pay gap        |                     | 2025   |
|-----------------------|---------------------|--------|
| Mean hourly pay gap   | In favour of women  | -8.57% |
| Median hourly pay gap | In favour of women  | -3.27% |
| Bonus participation   | Equal participation | 100%   |

## BUILDING SKILLS FOR THE FUTURE

### OUR COMMITMENT

Developing skills within our existing workforce and creating routes into employment are important to both the resilience of the business and the wider Lochaber economy.

Our training and development activity includes:

- Legally required and safety-critical training;
- Operational and technical competence;
- Apprenticeships and early careers;
- Professional qualifications;
- Undergraduate and postgraduate study; and
- Leadership and management development.

The challenge of attracting and retaining skilled workers within a rural economy makes developing talent locally particularly important. Working with schools, colleges, universities and other employers helps create sustainable routes into employment and supports the long-term availability of technical skills within the region.

### APPRENTICESHIPS & EARLY YEARS

In 2025, we recorded our highest-ever number of apprentices on site. More than 20% had begun their careers through an apprenticeship, demonstrating the potential for early-career opportunities to develop into long-term employment and progression within the business.

## TRAINING, DEVELOPMENT AND TALENT

### AT THE END OF 2025:

- x7 Modern Apprentices were in training;
- x2 Graduate Apprentices were completing degree-level qualifications;
- x1 employee was supported through undergraduate study;
- x3 employees were supported through postgraduate study; and
- x7 additional employees are completing a mix of formal training which the business is supporting.



### OUR STRATEGY

**Our relationship with Lochaber extends beyond direct employment.**

**We support local education, charities, sport, community organisations and events through company partnerships and sponsorship.**

#### EDUCATIONS & SKILLS DEVELOPMENT

We work closely with local schools, colleges, universities and other employers to help young people understand the range of careers available in manufacturing, engineering and other STEM-related fields.

#### DURING 2025 THIS INCLUDED:

- ‘Your Future Career in Lochaber’, initiated, hosted and led by Alvalance British Aluminium – delivered during Scottish Apprenticeship Week with UHI Inverness and local employers including BSW Timber, MOWI and Ferguson Transport & Shipping. The event promotes apprenticeship, graduate and work-based learning opportunities. 100 people signed for the event.
- Three employees continued to support the MCR Pathways mentoring programme at Lochaber High School, providing regular one-to-one guidance and helping young people realise their full potential.

- We continue to engage with a wide range of young people through school visits, site tours, work experience placements, careers fairs and STEM activities. These opportunities helped students learn more about our operations and explore the varied career pathways available at Lochaber.
- Throughout the year, we also welcomed a wide range of visitors to the site, including colleges, universities from throughout the UK, youth and community groups, and membership organisations. These visits provided an opportunity to raise awareness of our operations, showcase the breadth of opportunities available and strengthen our links with the wider community.



#### EMPLOYEE LED FUNDRAISING & VOLUNTEERING

Our employee-led Social Committee plays an important role in maintaining links between the business and the wider Lochaber community. Throughout the year, employees organise fundraising activities, identify local causes to support and encourage participation across the workforce.

During 2025, colleagues raised £2,500 for Lochaber Mountain Rescue Team through a site-wide raffle, with prizes and support also contributed by local businesses. A further £2,000 was raised for local and national charities, including Highland Action for Little Ones (HALO), Love in a Box Lochaber, and Lochaber Foodbank, alongside additional fundraising for Macmillan Cancer Support.



The contribution made by employees extends beyond individual fundraising events. Over time, activities led through the Social Committee have raised more than £10,000 for local charities and community organisations. In 2025, this commitment was recognised when the Chair of the Social Committee received the ‘Volunteer of the Year Award’ at the Voluntary Action Lochaber Awards. The award recognised an individual contribution but also reflected the wider involvement of employees who give their time to organising and supporting activities throughout the year.

## OUR STRATEGY

Our approach is deliberately employee-led. This allows support to be directed towards organisations and causes that our workforce has a personal connection with, and which provide tangible benefit within the communities where many of our employees and their families live.



SCOTTISH SIX DAY TRIAL 2025

### SUPPORTING LOCAL EVENTS AND COMMUNITY LIFE

Lochaber hosts a wide range of sporting, cultural and outdoor events which contribute to community life and the local visitor economy. We support a number of these activities through sponsorship, access to land and facilities, practical support and local partnerships..



MADE AT LOCHABER SMELTER

During 2025, this included continued involvement with the Fort William Mountain Festival and the Scottish Six Days Trial. These events attract participants and visitors from outside the region while also creating opportunities for local clubs, businesses and community organisations.

We also supported grassroots sport and participation during the year, including Lochaber High School's girls' football team, Inverlochry Primary School's P4–P7 shinty programme and Kilmallie Shinty Club's Under-17 team. These partnerships are relatively small in scale but provide direct support for youth participation, teamwork and the continued strength of locally important sports.

A particularly local collaboration in 2025 was the production of medals for the Ben Nevis Race using aluminium cast at the Lochaber smelter. The project connected one of the area's longest-established sporting events with local manufacturing and demonstrated a practical link between the material produced at the site and the community surrounding it.

Our partnership with Highland Cinema also continued during 2025. Through this arrangement, residents across Lochaber and neighbouring communities benefit from discounted access to cinema screenings, while associated engagement provides opportunities to increase awareness of aluminium manufacturing and careers within the industry.



Together, these activities reflect a broader approach to community support: combining financial sponsorship with employee participation, local partnerships and practical use of the assets and capabilities available to the business.

OUR STRATEGY - THE LOCHABER WAY

We believe that Continuous Improvement is a cultural journey of learning, development, and shared responsibility. Our Improvement Model places customer value at the heart of everything we do. For us, the term customer extends beyond those who purchase our products - it reflects the strong connections between our internal teams, our colleagues, regulators, suppliers, and the communities we serve.

Guided by our values, our focus on Purpose, Process, and People empowers every colleague to contribute to meaningful and sustainable improvement. By engaging the whole workforce, we continuously strengthen our business, enhance customer value, and deliver our long-term strategic goals.

OUR DELIVERED BENEFITS

Throughout 2025, we continued to embed Lean principles across the business by following a structured Plan–Do–Check–Act (PDCA) improvement cycle. This approach encouraged colleagues at every level to identify opportunities, solve problems, and deliver lasting change.

During the year, our front-line teams submitted 35 ‘Just-Do-It’ A4 improvements, while our certified Improvement Practitioners delivered five larger-scale A3 improvement projects.

These initiatives generated significant value across the business, including:

- Improved Health, Safety and Environmental (HSE) compliance.
- A reduction in business costs of £507,000.
- Increased colleague engagement and satisfaction through targeted ‘hearts-and-minds’ initiatives.
- A stronger culture of continuous improvement, collaboration, and operational excellence.

These achievements demonstrate how empowering our people to improve the way we work delivers measurable benefits for our business, our customers, and our communities.



# ENVIRONMENTAL DELIVERY



## OUR ENVIRONMENTAL AMBITIONS

Our environmental ambitions are made real through the way we operate every day. From our engineering and procedural controls for making aluminium to the way we monitor and report on performance - we continually work to minimise emissions and meet the highest regulatory standards. This means investing in proven technology, applying best available techniques, and maintaining robust management systems that ensure we protect the environment while delivering high-quality products.

## OUR VISION

To protect the natural resources and diverse ecosystems that sustain us, we are deeply committed to driving sustainable manufacturing forward.

Our mission is to lead the heavy industry transition to net zero.

Utilising the natural capacity of the Scottish Highlands, we match primary aluminium smelting with renewable electricity generation. We recognise that we must act as responsible custodians of the natural landscapes and resources vital to our operations. We build long-term business resilience by ensuring every manufacturing decision prioritises environmental mitigation and community well-being.

## SUSTAINABLE STRATEGY

As global regulatory bodies enforce mandatory climate reporting, our environmental strategy focuses on mitigating supply chain risks, optimising resource efficiency, and ensuring compliance with evolving global frameworks. Alongside industry decarbonisation, we recognise that competent stewardship of natural resources has huge potential to increase carbon sequestration. Alvanco continues to work alongside its associated sister companies, SIMEC and JAHAMA Highland Estates to foster sustainable development across its infrastructure and landholdings. Together, we strive to transform how industry operates, by embedding environmental mitigation into the heart of our commercial strategy, safeguarding the planet for future generations and driving sustainable manufacturing.

## LEVERAGE RENEWABLE ENERGY

We actively drive the green energy transition by anchoring our energy-intensive smelting operations directly to the natural, renewable capacity of our local highland assets. Through our on-site hydro-electric scheme, we harness local water catchments to supply continuous, clean energy directly to our potrooms. This drastically reduces our reliance on fossil-fuel grids, providing a model for low-carbon manufacturing that supports both national net-zero targets and localised energy security.

## REGULATORY COMPLIANCE

Process emissions are strictly managed and monitored in compliance with the European Parliament's Directive 2010/75/EU for Non-ferrous Metals.

We operate under a strict Pollution Prevention and Control (PPC) framework regulated by the Scottish Environment Protection Agency (SEPA). Our operations systematically maintain emissions well within mandated Best Available Techniques (BAT) reference limits.

## ENVIRONMENTAL GOVERNANCE

Environmental risks, impacts, and emergency preparedness protocols are governed via an ISO 14001 certified Environmental Management System (EMS). This system undergoes continuous independent external verification to ensure procedural compliance and proactive risk mitigation.

## DATA CONTROL FRAMEWORK

Robust data assurance is foundational to our reporting transparency. The site collates, tracks, and audits critical environmental metrics continuously throughout the year. To eliminate reporting errors and ensure audit readiness, data is consolidated on a monthly basis, with results and performance being shared across departments.



## CLIMATE CHANGE

### OUR STRATEGY

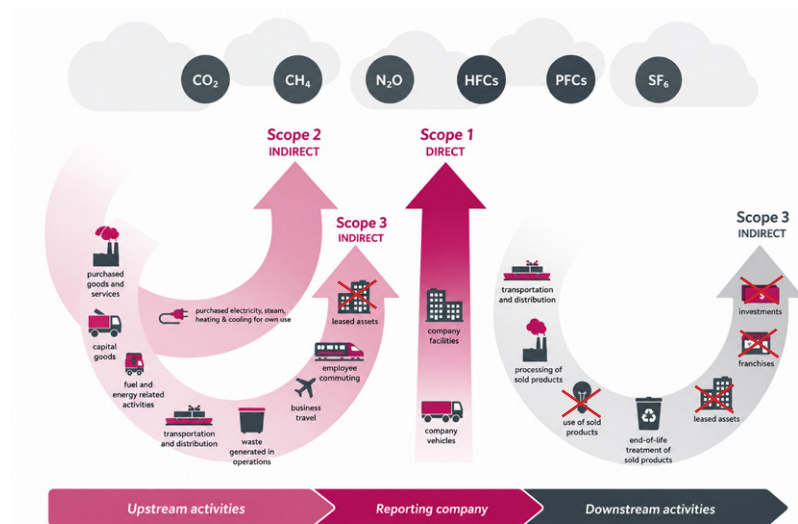
The aluminium industry contributes approximately 2-3% of total global greenhouse gas emissions. Decarbonisation of the production process is crucial for the global transition to a net-zero economy. We remain firmly committed to evolving our operations in alignment with the 1.5°C climate pathway.

The escalating impacts of climate change demand decisive, immediate intervention across global industries. As an energy and emissions-intensive sector, primary aluminium production faces a profound challenge: we must rapidly decouple our industrial footprint from our output while operating in a market with accelerating demand.

Aluminium remains an indispensable material for the modern world, and its importance is growing. Crucially, the global transition to a low-carbon economy relies directly on our sector. As a vital component in lightweight electric vehicles, renewable energy generation and updated electrical grids, global demand for aluminium is still on track to double by 2050.

But our vision extends beyond carbon management. Our strategy operates on the principle that decarbonisation is deeply interconnected with broader environmental and social impacts; it must be holistic and extend beyond emissions reduction to actively safeguard biodiversity, uplift local communities, and ensure a more just and inclusive transition for all.

### GHG EMISSIONS METHODOLOGY



*\*Image adapted from source: World Resources Institute & World Business Council for Sustainable Development, (2013) Greenhouse Gas Protocol Technical Guidance for Calculating Scope 3 Emissions (v1.0)\*\**

Consistent with previous years, we determined our greenhouse gas (GHG) footprint using the operational control approach. Under this framework, we account for 100% of emissions from assets where we maintain direct operational authority.

**Organisational Boundary:** Lochaber Aluminium Smelter in Fort William, Scotland, is the sole facility over which Alvalance has operational control. It does not extend to any other facilities on the same site, as these are operated by a separate, non-subsidiary entity.

**Temporal Boundary:** Calculations reflect data compiled over the standard calendar year, 1 January to 31 December 2025.

**Operational Boundary:** The reporting boundary captures all relevant Scope 1 and Scope 2 emissions drivers, alongside material Scope 3 sources. A comprehensive value-chain materiality assessment was conducted to map these indirect emissions, with all significant Scope 3 categories highlighted in the diagram above.

## EMISSIONS

The emissions have been calculated in line with standard practices outlined in:

- Greenhouse Gas Protocol – A Corporate Accounting and Reporting Standard (Greenhouse Gas Protocol, 2015)
- GHG Protocol Scope 2 Guidance (Greenhouse Gas Protocol, 2015)
- Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Greenhouse Gas Protocol, 2011)
- Technical Guidance for Calculating Scope 3 Emissions (Greenhouse Gas Protocol, 2013)

Emission factors used as part of the calculations for Alvalance's GHG footprint have been sourced from publicly available emissions factor libraries including:

- UK Government Department for Energy Security and Net Zero – GHG Conversion Factors for Company Reporting 2025 (Department for Energy Security and Net Zero, 2025)
- US EPA - Supply Chain Emissions (US Environmental Protection Agency, 2025)
- Intergovernmental Panel on Climate Change - Annex III: Technology-specific cost and performance parameters (Schl  mer et al., 2014).

The factors used account for a range of greenhouse gases, primarily CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O, but also, where appropriate, other trace gases (HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>). The global warming potential (GWP) of each gas is laid out in the respective sources.

## VERIFICATION OF EMISSIONS

SLR Consulting has acted as verifier of Alvalance British Aluminium's inventory of data used to calculate its greenhouse gas (GHG) emissions in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Assurance Engagements other than Audits or Reviews of Historical Financial Information) and the relevant subject-matter specific ISAE for GHG data (ISAE 3410, Assurance Engagements on Greenhouse Gas Statements).

It is the verifier's opinion that there are no material misstatements in the GHG data provided by Alvalance.



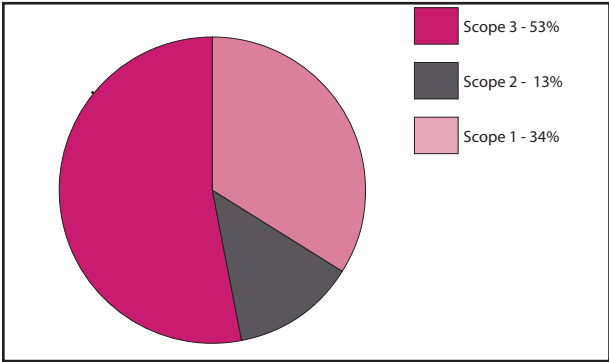
CLIMATE CHANGE

2025 GHG EMISSIONS SUMMARY

Lochaber smelter's carbon footprint for 2025 was 144, 623 tonnes of CO2 equivalent (tCO2e). This includes Scope 1, 2 and 3 emissions, which are further broken down below.

LOCHABER SMELTER SCOPE 1, 2 & 3 EMISSIONS 2025

| Scope | tCO <sub>2</sub> e |
|-------|--------------------|
| 1     | 49,778             |
| 2     | 18,675             |
| 3     | 76,170             |
| Total | 144,623            |



SCOPE 1

Our scope 1 GHG emissions are primarily driven by direct emissions from the smelting process, fuel consumption on site and in company vehicles, as well as minor refrigerant losses from cooling systems.

|      | Scope 1 emissions tCO <sub>2</sub> e | Change (%)   | Scope 2 emissions tCO <sub>2</sub> e | Change (%)   | Scope 3 emissions tCO <sub>2</sub> e | Change (%)          |
|------|--------------------------------------|--------------|--------------------------------------|--------------|--------------------------------------|---------------------|
| 2024 | 47,038.0                             | 2024 to 2025 | 15,813.0                             | 2024 to 2025 | 61,011.0                             | Change 2024 to 2025 |
| 2025 | 49,778.0                             | +5.8%        | 18,674.9                             | +18.1%       | 76,170.2                             | +24.8%              |

Our absolute Scope 1 emissions increased by 5.8% in 2025 compared to 2024. This change was primarily due to increased production volumes alongside the implementation of more rigorous data collection procedures. While this increase is a variance we are actively working to correct, the enhanced robustness of our reporting protocols provides a more accurate baseline. Maintaining high levels of data transparency remains a core operational priority.

SCOPE 2

Our absolute Scope 2 emissions increased by 18.1% compared to the previous reporting period, due to our increased participation in a national wind-balancing service.

To support national grid stability, the smelter continues to provide grid-balancing services by absorbing excess regional wind power. During these curtailment periods, we import electricity from the national grid rather than drawing from our on-site hydroelectric supply. Although this supports wider grid integration of renewables, it also increases our reported annual electricity consumption figures as we cannot currently verify that this import has come from wind generation exclusively.

SCOPE 3

Indirect emissions resulting from operations up and down the value chain, represented the most significant portion of our carbon footprint in 2025.

The table below details the proportion of Scope 3 emissions attributed to each category.

Our scope 3 emissions increased by 24.8% in 2025. This upward trajectory was influenced by our expanded metal production, which drove higher upstream raw material procurement and associated upstream logistics. Changes in international trade dynamics and tariffs in 2025 also influenced our downstream distribution footprint, with the company increasing exports to the USA.

As scope 3 encompasses some activities outside our direct operational control, we are actively engaging with our key supply chain partners to enhance the specificity of our emissions data and collaborate on shared decarbonisation pathways.

OUR PERFORMANCE

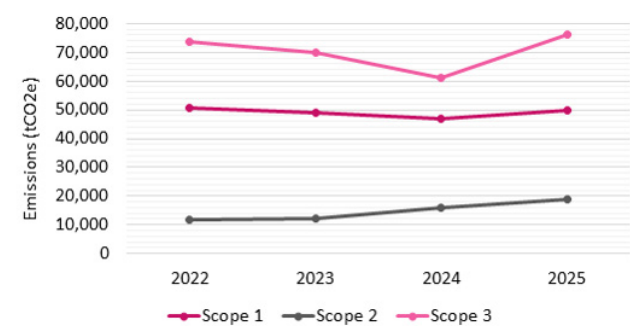
| Scope 3 Breakdown of Emissions                                                                                               | Emissions (tCO2e) |          | Change (%)   |
|------------------------------------------------------------------------------------------------------------------------------|-------------------|----------|--------------|
| Category                                                                                                                     | 2024              | 2025     | 2024 to 2025 |
|  Purchased Goods & Services                 | 28,434.5          | 40,921.7 | 43.9%        |
|  Capital Goods                              | 426.3             | 318.1    | -25.4%       |
|  Fuel & Energy Related Activities           | 14,443.9          | 14,743.2 | 2.1%         |
|  Upstream Transportation & Distribution     | 5,757.2           | 6,930.7  | 20.4%        |
|  Waste Generated in Operations              | 391.5             | 291.8    | -25.5%       |
|  Business Travel                           | 1.0               | 2.0      | 98.5%        |
|  Employee Commuting                       | 35.5              | 37.3     | 5.1%         |
|  Downstream Transportation & Distribution | 1,862.0           | 2,643.1  | 42.0%        |
|  Processing of Sold Products              | 8,724.6           | 9,259.5  | 6.1%         |
|  End-of-Life Treatment of Sold Products   | 934.6             | 1,022.8  | 9.4%         |
| Total                                                                                                                        | 61,011.0          | 76,170.2 | +24.8%       |

EMPLOYEE COMMUTING



EMISSIONS SUMMARY

The graph below shows the trajectory of our GHG footprint over the last four years. Although it is disappointing to report an increase across all scopes after a downward trend, these results reflect a clear correlation between expanded production, geopolitical changes and improvements in our data collection integrity.



Despite this short-term increase, we view this visibility as a critical tool for strategic governance. With a more precise understanding of our primary emissions drivers, we can actively adjust our procurement and logistics frameworks to drive reductions in the upcoming reporting cycle.

GHG EMISSIONS BENCHMARKING



Although it is disappointing to report an increase across all scopes after a downward trend, these results reflect a clear correlation between expanded production, geopolitical changes and improvements in our data collection integrity.

|      | Total Emissions<br>tCO <sub>2</sub> e | Production<br>Intensity<br>tCO <sub>2</sub> e/t Al | Global<br>Average | % Difference |
|------|---------------------------------------|----------------------------------------------------|-------------------|--------------|
| 2022 | 136,017                               | 4.40                                               | 15.8              | -72%         |
| 2023 | 130,867                               | 4.47                                               | 15.1              | -70%         |
| 2024 | 123,862                               | 4.26                                               | 14.8              | -71%         |
| 2025 | 144,623.1                             | 4.81                                               | 14.4              | -67%         |

In 2025, our production intensity stood at 4.81 tCO<sub>2</sub>e per tonne of aluminium produced, which is approximately 67 % lower than the IAI's most recently reported global average of 14.4 tCO<sub>2</sub>e/t. This difference reflects our strong reliance on renewable hydroelectric power and our continuous focus on efficiency throughout our operations.

*(Primary Aluminium Greenhouse Gas Emissions Intensity - International Aluminium Institute)*

GHG EMISSIONS REDUCTION PATHWAY

Alvance British Aluminium established its greenhouse gas emissions reduction pathway using the ASI Entity GHG Pathways Method and Calculation Tool.

The pathway uses 2022 as the fixed baseline year and is consistent with a 1.5°C warming scenario. It covers cradle-to-gate emissions from:

- Scope 1 emissions arising from our operations;
- Scope 2 emissions associated with imported electricity; and
- Relevant upstream Scope 3 emissions from purchased goods and services, fuel- and energy-related activities, and upstream transportation and distribution.

The pathway is measured in tonnes of carbon dioxide equivalent per tonne of aluminium and is based on production measured at casthouse output.

PERFORMANCE AGAINST PATHWAY

| Year                     | ASI pathway intensity<br>(tCO <sub>2</sub> e/t Al) | Actual intensity<br>(tCO <sub>2</sub> e/t Al) |
|--------------------------|----------------------------------------------------|-----------------------------------------------|
| 2022 baseline            | 3.93                                               | 3.93                                          |
| 2023                     | 3.81                                               | 4.00                                          |
| 2024                     | 3.74                                               | 3.84                                          |
| 2025                     | 3.67                                               | 4.36                                          |
| 2027 intermediate target | 3.54                                               | -                                             |

## OUR STRATEGY

In 2025, our cradle-to-gate emissions intensity increased from 3.84 to 4.36 tCO<sub>2</sub>e/t Al, an increase of 13.5%.

The 2025 result was 0.69 tCO<sub>2</sub>e/t Al above the pathway value for the year. Achieving the 2027 intermediate target would require an emissions-intensity reduction of approximately 19% from the 2025 position.

Our 2025 performance was therefore not in line with the pathway. The increase reinforces the need to focus not only on emissions under our direct control, but also on the electricity and upstream supply-chain emissions that form a significant part of our cradle-to-gate footprint.

The largest year-on-year increase occurred in purchased goods and services, which increased by approximately 12,487 tCO<sub>2</sub>e compared with 2024.

Alumina and baked anodes accounted for approximately 92% of purchased-goods-and-services emissions in 2025. Their supply routes also accounted for the large majority of upstream transportation emissions. Further engagement with these suppliers will therefore be central to improving both the quality of our Scope 3 data and our understanding of credible reduction opportunities.

## OUR INTERIM REDUCTION PLAN

Our five-year GHG Emissions Reduction Plan was established from the 2022 baseline. It focuses on Scope 2 electricity, Scope 3 fuel- and energy-related emissions, supply-chain engagement and customers. The plan is reviewed annually in accordance with our GHG management procedure.

## PROGRESS DURING 2025

### SCOPE 2 ELECTRICITY

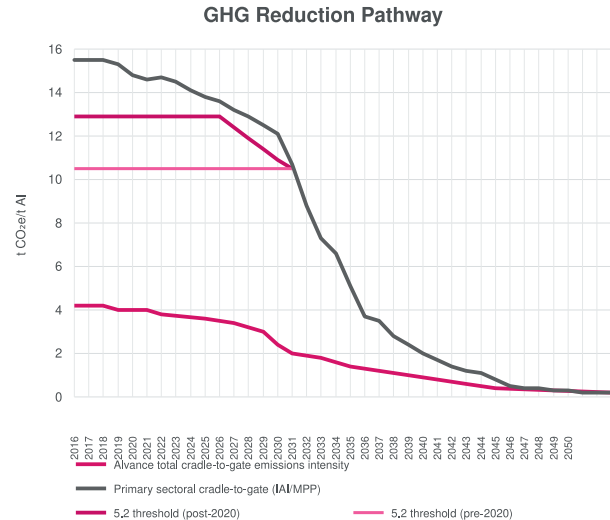
Imported electricity is currently calculated using the annual UK grid-average emissions factor. This does not reflect the carbon intensity of the grid during the specific half-hourly periods when imports occur, including imports associated with Balancing Mechanism activity.

Proposed revisions to the GHG Protocol Scope 2 Guidance would place greater emphasis on using the most precise location-based emissions factors available, matched to activity data of the same level of detail. This may enable our half-hourly import data to be matched with published half-hourly grid-intensity data, providing a more representative calculation of emissions from imported electricity.

As the revised guidance has not yet been finalised, we will continue to use the current approved methodology while monitoring the outcome of the revision and assessing its implications with our verifier.

### SCOPE 3 FUEL & ENERGY RELATED EMISSIONS

We reviewed the well-to-tank and transmission and distribution factors applied to our electricity sources. The review did not identify a material opportunity to reduce reported emissions through more site-specific factors. This area will remain under review, but it is not currently expected to provide a significant reduction in emissions intensity.



## OUR STRATEGY

We are committed to minimising the potential for negative impact on our environment and our surrounding community through careful management of our emissions to air.

While greenhouse gas accounting focuses on global climate impacts, we recognise that managing localised air quality is fundamental to protecting the unique ecosystem in the Scottish Highlands and ensuring the well-being of our local community. Our operations at the Lochaber Aluminium Smelter are governed by strict emission limits defined under our PPC permit PPC/A/1157314, regulated by SEPA.

To maintain compliance and drive down localised emissions, we continue to utilise and maintain Best Available Techniques (BAT) across all operations.

Infrastructure to manage air emissions on site includes a gas treatment centre, composed of three stacks that treat emissions directly released by the smelting process, and another 12 stacks across the site with bag filters to capture dust emissions from supporting processes.

Emissions data is captured via continuous emissions monitoring systems (CEMS). This real-time data is verified by independent, third-party stack sampling conducted bi-annually. To guarantee data precision, all monitoring infrastructure undergoes comprehensive health checks and calibration every six months.

## LOOKING AHEAD

In accordance with the requirements of our PPC permit, we actively monitor the local environment to assess the impact of our operations on surrounding vegetation, which can absorb airborne fluorides. During the growing season, grass samples are collected monthly from 10 designated locations within a five-mile radius of the smelter and evaluated internally at our site laboratory.

### OUR PERFORMANCE - MASS EMISSIONS

Unfortunately, in 2025, we have seen an increase across all mass emissions from the smelter as compared to 2024. While our absolute emissions rose due to increased production, we also saw an increase in emissions intensity over the year. This rise in intensity can be primarily attributed to the temporary stabilisation phase of new smelting cells.

During the start-up window, cell conditions are unstable while it reaches optimal operating temperature and chemical stability. This period is associated with higher immediate emissions, as well as increased energy consumption.

While these figures are disappointing to see, we anticipate intensity levels to normalise and improve in line with our previous trajectory once these cells reach operational stability.



Laggan Dam

EMISSIONS INTENSITIES ARE DISPLAYED ON THE FOLLOWING TABLES

| Pollutant - GHG | 2023  | 2024  | 2025  | Difference |
|-----------------|-------|-------|-------|------------|
| PFCs (kg/t Al)  | 0.014 | 0.008 | 0.011 | +36.2%     |

| Pollutant – Non-GHG          | 2023   | 2024   | 2025   | Difference |
|------------------------------|--------|--------|--------|------------|
| Fluoride (kg/t Al)           | 0.618  | 0.451  | 0.524  | +16.2 %    |
| Particulate Matter (kg/t Al) | 0.925  | 0.681  | 0.873  | +28.2 %    |
| SO <sub>2</sub> (kg/t Al)    | 13.137 | 12.583 | 12.798 | +1.7 %     |
| NO <sub>x</sub> (kg/t Al)    | 0.069  | 0.060  | 0.067  | +11.3 %    |

MASS EMISSIONS ARE ALSO SUMMARISED BELOW:

| Pollutant               | 2023   | 2024    | 2025  | Difference |
|-------------------------|--------|---------|-------|------------|
| NO <sub>x</sub> (te)    | 2.039  | 1.78    | 2.05  | +15.4 %    |
| PFC's (te)              | 0.400  | 0.233   | 0.329 | +41.1 %    |
| Fluoride (te)           | 18.174 | 13.404  | 16.15 | +20.5 %    |
| Particulate Matter (te) | 27.202 | 20.232  | 26.88 | +32.9 %    |
| SO <sub>2</sub> (te)    | 386.53 | 373.713 | 394.1 | +5.5 %     |

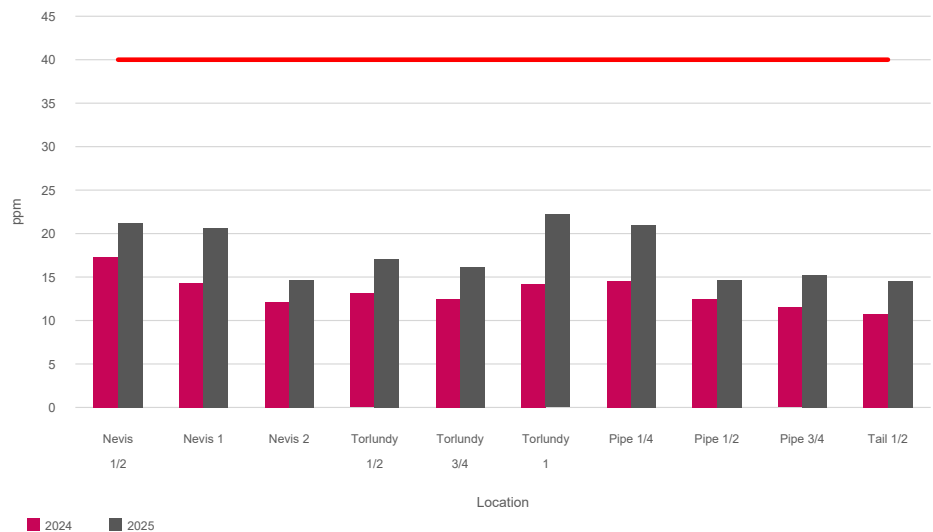
Despite this year’s results, we remain committed to driving down all emissions across our operations. While the commissioning of eight new cells in 2025 has created a temporary uptick in emissions intensity, figures remain below the previous six-year averages, and in line with overall decreasing trends as shown in the charts below.



## FLUORIDE IN GRASS

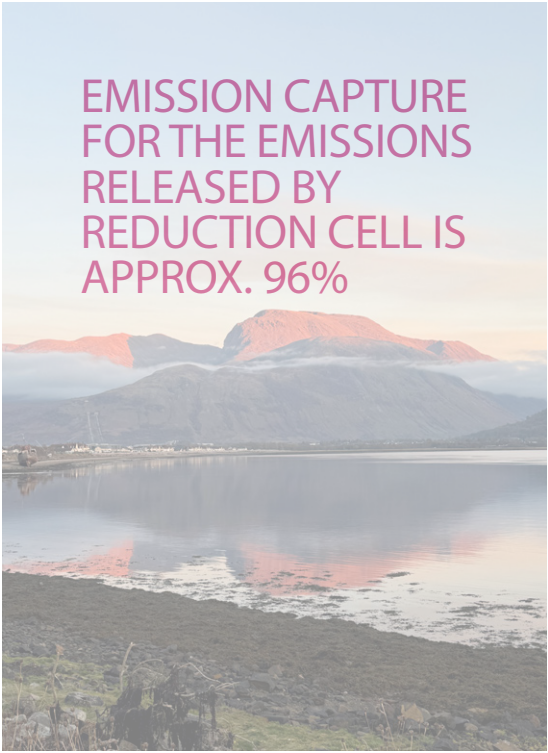
Results for fluoride levels in grass in both 2024 and 2025 are displayed in the following graph, alongside the limit for the 12-month rolling average. Levels of fluoride at all measured locations remain well below advisory limit levels.

There has been a slight increase in fluoride levels at all locations as compared to the low levels recorded in 2024. We continue to monitor the levels each month and look for trends in the data.



## LOOKING AHEAD

Although it is disappointing to report higher mass emissions levels after a successful downward trend in 2024, this reinforces our resolve to seek out further improvement opportunities to work towards continuous improvement and strengthens our commitment to achieving sustainably low emissions levels.



OUR PERFORMANCE

Operating in a sector defined by high inherent energy intensity, we leverage our dedicated hydroelectric plant to lead the industry’s transition toward low-carbon manufacturing while continuously driving site-wide resource optimisation.

We systematically record all resource utilisation metrics across our operations. This inventory details raw material consumption volumes, alongside energy tracking, fuel, and material efficiency ratios per tonne of primary aluminium produced. Resource use data is entered into spreadsheets following deliveries, meter readings and stock level checks.

ELECTRICITY GENERATION

Throughout 2025, our onsite hydro scheme and associated power station generated a total of 458,083 MWh electricity.

Of this total, 367,974 MWh was consumed on site for both the operational processes including cell electrolysis, and auxiliary power such as office electricity, and 85,063 MWh was exported to the National Grid through the Wind Balancing Scheme.

LOOKING AHEAD

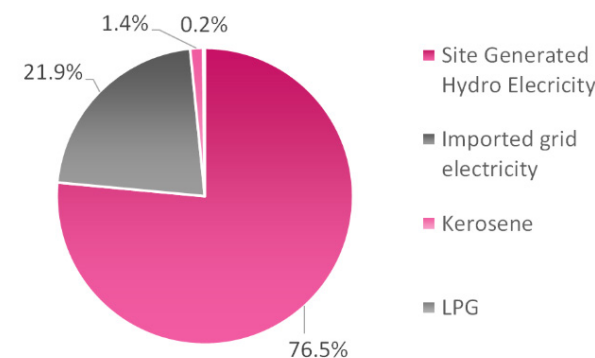
We maintain a comprehensive, 24-hour oversight of hydrological data and dam levels, allowing us to align our generation strategy with real-time weather patterns and ensure we are capturing the maximum energy potential of our natural resources.

By synchronising our hydro output with real-time operational demand and grid volatility, we maximise the ‘energy value’ of every cubic metre of rainfall, ensuring that our natural resource intake is converted into either direct industrial productivity or essential national grid stability.



ENERGY CONSUMPTION

In 2025, the site’s total energy consumption was 481,139 MWh. This includes the use of electricity, LPG and kerosene. Total MWh of each energy source is shown below.

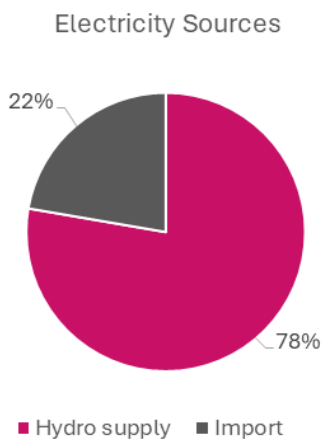


| Source                      | Usage (MWh) |       |
|-----------------------------|-------------|-------|
| Hydro Generated Electricity | 367974      | 77 %  |
| Grid Imported Electricity   | 105508      | 22 %  |
| Kerosene                    | 6781        | 1.4 % |
| LPG                         | 875         | <1%   |

The majority of the electricity we use is generated by our own hydro scheme, with the remainder being imported from the national grid.

ELECTRICITY SOURCES

A total of 78% of the smelter’s electricity was generated from 100% renewable sources in 2025.



SMELTING ENERGY INTENSITY

Energy use remains a key performance indicator for Alvalance British Aluminium, given the energy-intensive nature of primary aluminium production.

We closely monitor our specific energy consumption (measured in megawatt hours per tonne of aluminium produced) to drive efficiency and benchmark our performance against industry standards. The table across shows our total energy usage and specific energy consumption for the past four years, compared to the global average reported by the International Aluminium Institute (IAI):



| Year | Usage (MWh) | MWh/t | Global Avg |
|------|-------------|-------|------------|
| 2022 | 421331.35   | 13.43 | 14.119     |
| 2023 | 394297.23   | 13.40 | 14.091     |
| 2024 | 399002.90   | 13.43 | 13.990     |
| 2025 | 412938.32   | 13.41 | 13.990     |

In 2025, our site maintained an energy intensity of 13.41 MWh/t, which is approximately 4% lower than the most recent global average of 13.99 MWh/t reported by the IAI. This continued performance reflects our disciplined focus on operational efficiency and the advantage of using renewable hydropower as our primary energy source.

*(Primary Aluminium Smelting Energy Intensity - International Aluminium Institute)*

RAW MATERIALS

Our commitment to resource efficiency extends to the meticulous management of our primary raw materials, alumina and carbon anodes. We optimise our electrolytic reduction processes to ensure the most efficient conversion of alumina into high quality aluminium, prioritising optimal anode consumption rates to maximise their longevity and reduce the associated carbon footprint of our smelting operations.

In 2025 the site used 1.9t of alumina per tonne of hot metal, and 0.5t of carbon anode per tonne of hot metal. These figures are consistent with the previous five years +/-0.01t.

BY-PRODUCTS & WASTE CIRCULARITY

We maximise our resource efficiency further through the recovery of process by-products away from landfill and toward specialised recovery streams where they become secondary raw materials for other industries. We optimise the value of our most significant process outputs by selling them into dedicated recycling streams, transforming our two largest waste categories into secondary raw materials.

**DROSS:** We recapture aluminium dross, and other metal impurities extracted throughout the smelting and casting process, ensuring this metal is diverted from the waste stream and returned to the productive economy.

**CARBON:** Waste carbon from anodes that cannot be re-used in the cells is sold on to be used as a fuel source.

**BATH:** Our on-site bath treatment plant recycles used electrolytic material for re-use within the smelting process, reducing both waste and the need for new raw materials.

In 2025, we recycled 903 tonnes of aluminium dross and 3,677 tonnes of carbon - together, these streams accounted for 83% of our total waste material for the year.

By prioritising the recapture of these high-volume materials, we have integrated circularity into our core production model, ensuring that the majority of our process outputs are transformed into valuable secondary resources rather than waste.



## LIFE CYCLE ASSESSMENT

### OUR STRATEGY

To truly understand the environmental impact of our aluminium, it is necessary to look at the entire lifespan. We do this through a life cycle assessment (LCA). This type of analysis looks beyond legal compliance. It measures the potential environmental impacts of a product and encourages improvement in the management of impacts across the entire value chain.

In 2025, we completed a comprehensive, independent Life Cycle Assessment (LCA) of our aluminium production operations to quantify our environmental footprint. The study was conducted by an external, third-party consultant and adheres to the globally recognised ISO 14040:2006 and ISO 14044:2006 standards for lifecycle management.

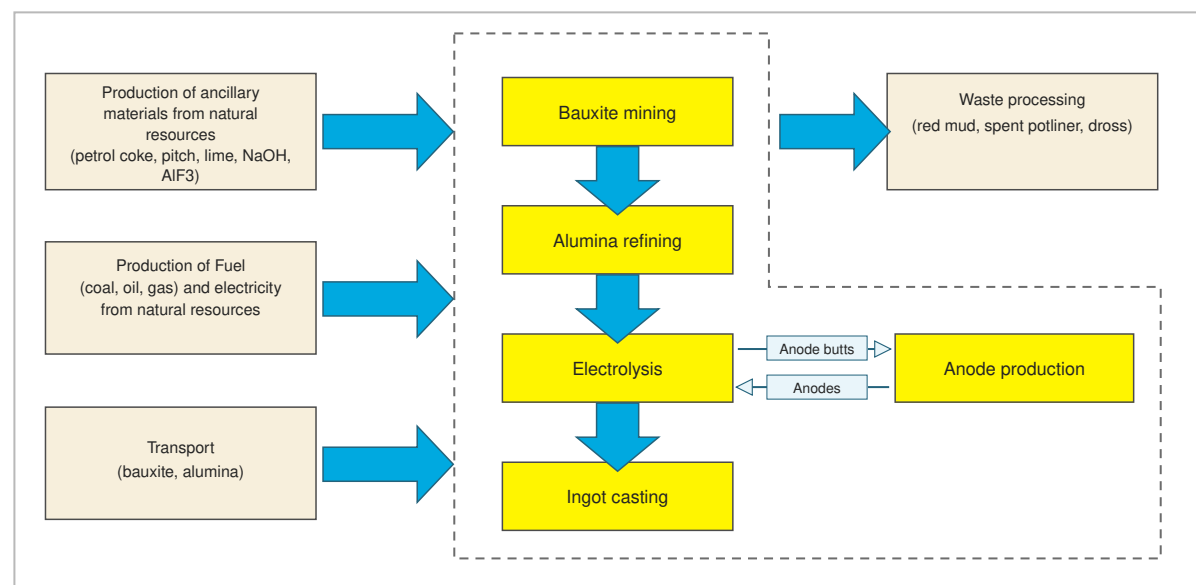
To ensure our data is fully bench-markable against the global industry, the methodology directly aligns with the frameworks established by European Aluminium (EA) and the International Aluminium Institute (IAI). The system boundary is defined as cradle-to-gate, tracking all environmental inputs and outputs from the initial mining stage up to the final dispatch gate of the smelter.

**This structural boundary encompasses the following core operational phases, as illustrated in the figure across.**

- Raw Material Extraction: Bauxite mining and associated land management.
- Refining Processes: Transformation of bauxite into alumina.
- Anode Manufacturing: Production of carbon anodes required for electrolysis
- Smelting Operations: Energy-intensive reduction of alumina into liquid aluminium.
- Casting and Finishing: Ingot casting up to the point of product shipment.



*Figure 1: Aluminium Life Cycle, Cradle to Gate (International Aluminium Institute, 2019)*



OUR PERFORMANCE

Our 2025 Life Cycle Assessment indicates that the carbon footprint for our aluminium is between 4.1 and 6.8 tonnes of CO2e per tonne of aluminium.

As reported by our independent assessor the true emissions figure is dependent on which rules and assumptions are applied to the calculation. The variation between our lower-bound and upper-bound emissions figure is strongly influenced by two primary methodological choices: the accounting approach for purchased electricity and the treatment of exported hydroelectricity.

In alignment with regulatory compliance standards, evaluating multiple scenarios ensures full visibility into how power procurement and grid interaction shape our environmental profile.

- 6.8 tCO2e/t: This value is obtained without applying any credit for exported hydroelectricity to the production of aluminium and applying the “market-based” approach to representing purchased electricity.
- 4.1 tCO2e/t: This value is achieved when applying the “location-based” approach to representing purchased electricity and applying a displacement

The table below illustrates how different standard assumptions impact the reported footprint.

| Scenario                     | tCO2e/t | Purchased Electricity Accounting Method | Export Hydroelectricity Treatment                                                      | Reporting Implication                                                                                                                                               |
|------------------------------|---------|-----------------------------------------|----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Optimistic<br>Lower Bound.   | 4.1     | Location based approach.                | Displacement credit applied due to displacement of conventional grid intensity.        | Reflects the physical greenhouse gas intensity of the regional grid, modified by subtracting emissions avoided elsewhere due to the export of surplus clean energy. |
| Conservative<br>Upper Bound. | 6.8     | Market based approach.                  | Exported electricity is omitted because it is not consumed on-site. No credit applied. | Reflects contractual energy procurement instruments only. It excludes any external emission changes resulting from sending surplus power to the wider grid network. |

Other data with a significant influence on the results are those representing bauxite refining to alumina and anode production.



## LCA BENCHMARKING

To assess our market position, we benchmark our 2025 LCA results against regional and global industry averages. Evaluating our performance against standardised benchmarks ensures our data remains transparent and provides our stakeholders with a clear context of our position within the global transition to low-carbon metals.

The global aluminium sector is highly energy-intensive, with a footprint heavily dictated by regional power grids. The table below positions our 2025 performance range:

In alignment with regulatory compliance standards, evaluating multiple scenarios ensures full visibility into how power procurement and grid interaction shape our environmental profile.

|                               | Average Carbon Footprint (tCO <sub>2</sub> e/t) |
|-------------------------------|-------------------------------------------------|
| Global Industry Average**     | 16.8                                            |
| European Industry Average**   | 7.2                                             |
| Lochaber Smelter: Upper Bound | 6.8                                             |
| Lochaber Smelter: Lower Bound | 4.1                                             |

\* International Aluminium Institute 2019 -- Life Cycle Inventory Data and Environmental Metrics for the Primary Aluminium Industry -- November 2022

\*\* European Aluminium (2025) - Environmental Profile Report for the European Aluminium industry, May 2025, version 2.0 process, reducing both waste and the need for new raw materials.



Our 2025 Life Cycle Assessment confirms that our aluminium operates with a major low-carbon advantage, delivering a carbon footprint between 4 and 7 tCO<sub>2</sub>e/t that sits 58% to 76% below the global industry average of 16.8 tCO<sub>2</sub>e/t, and is highly competitive against the European average of 7.2 tCO<sub>2</sub>e/t.



## WASTE MINIMISATION

### OUR STRATEGY

We recognise that effective waste management is critical to our sustainable growth. We remain dedicated to proactively exploring innovative solutions to mitigate waste creation across the business.

Throughout 2025, our operational framework remained strictly aligned with the statutory requirements of our Pollution Prevention and Control (PPC) permits. These permits mandate the diligent, annual recording and verification of all waste emissions, serving as a mechanism to ensure the smelter operates in full compliance with environmental regulations.

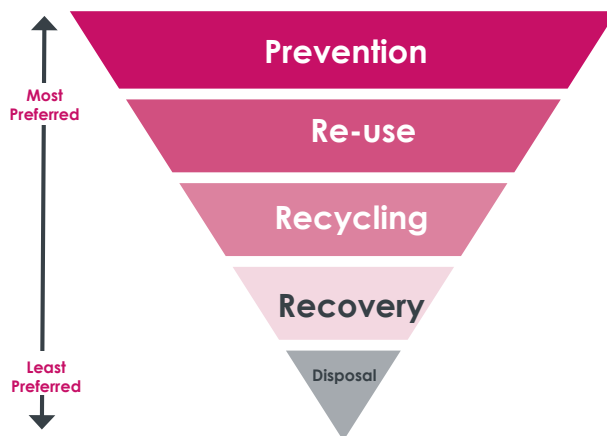
To maintain data integrity, all waste metrics are systematically recorded in our centralised data collection spreadsheets immediately following waste transfers and certified weigh-ins.

Through rigorous monitoring, employee engagement, and the adoption of sustainable procurement practices, we continuously strive to optimise resource consumption and enhance our environmental stewardship.



One of the  
**Greenest**  
aluminium manufacturing  
sites in the world

The **waste minimisation hierarchy** is at the core of our waste management policy. Our focus is on eliminating waste streams where possible, exploring options for re-use, recycling and recovery on site.

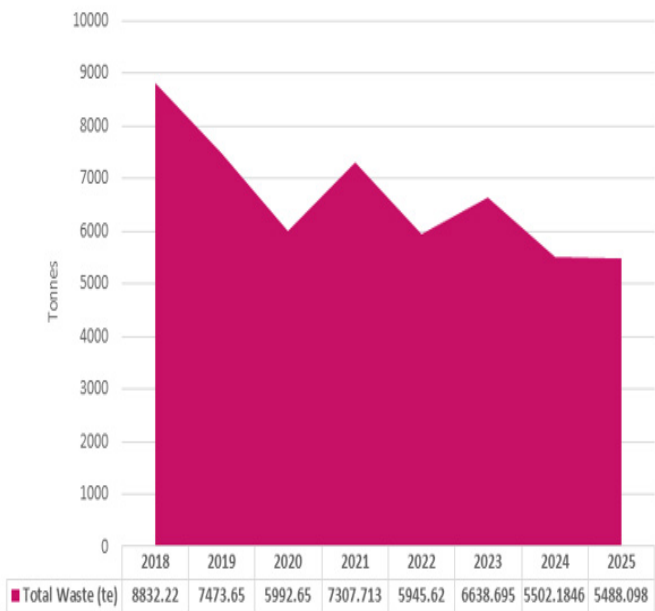


OUR PERFORMANCE

The graph below shows that total waste generation across the site has decreased by 14 tonnes in 2025 when compared to 2024.

2025 saw some improvements to recycling points across the site, as well as how we manage and report waste streams. It is encouraging to report that the site has successfully managed to further reduce waste generation across operations, while also increasing production.

This reduction directly aligns with our site-wide objective to reduce our environmental footprint and move closer to our long-term ambitions to minimise waste to landfill.

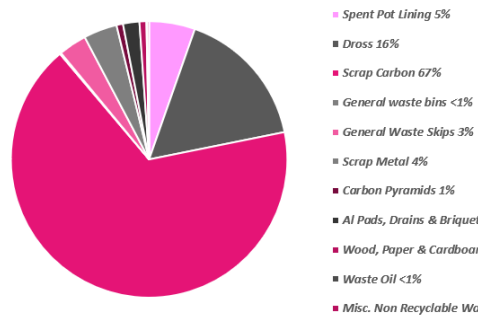


Total waste generation across the site has decreased by 3344 tonnes in the seven years from 2018 to 2025. As shown in the graph below, we saw a small rise in waste generation in 2023, primarily due to the removal of excess anode cover from the site. Anode cover is a key material in our process; however, due to the gradual reduction in operational cells in previous years, there was to appropriate levels for current production, ensuring anode cover will no longer be a waste stream on site.

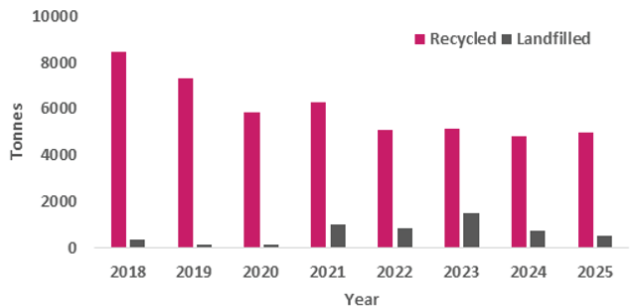
The chart below shows the split of waste materials produced at Lochaber Smelter in 2025.

The major waste categories are:

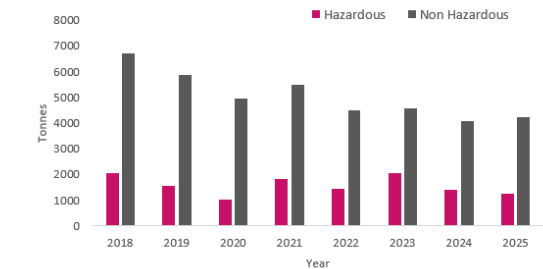
- Scrap carbon - recycled
- Dross - recycled
- Spent Point Lining (SPL) - a waste stream that arises when the aluminium cells reach the end of their operational lifetime (approx. 6.5 years) – currently sent to landfill.



The graph below shows that, in addition to reducing overall waste, our annual recycling rates are also moving in a positive direction. The site has increased our recycling rate from 87% in 2024 to 90% in 2025. Spent pot lining remains the primary landfill waste stream due to current UK recycling limitations for this hazardous material.

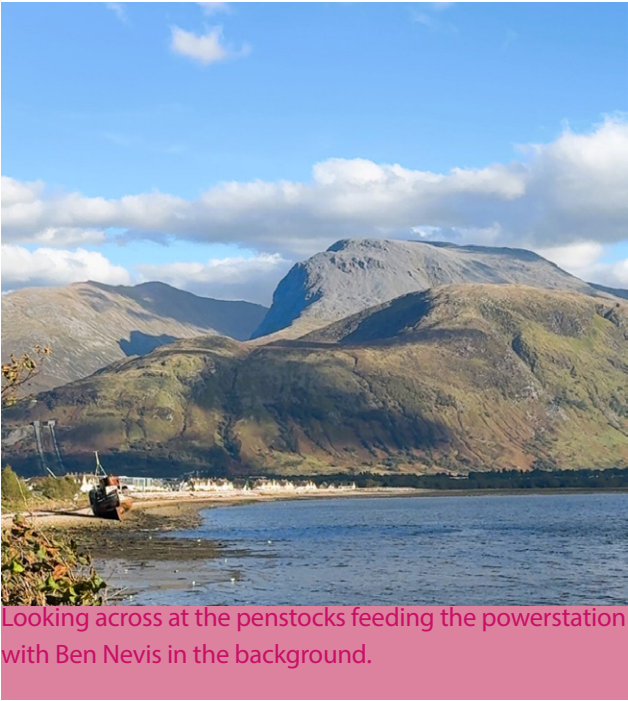


The graph below also shows that the majority of waste produced at the site is classified as non-hazardous. Spent pot lining and aluminium dross from the casting furnaces make up 96% of the hazardous waste leaving site.



LOOKING AHEAD

The smelter is currently exploring recycling possibilities for SPL, with plans in place to eliminate this landfill waste stream by the end of 2026.



Looking across at the penstocks feeding the powerstation with Ben Nevis in the background.



# OUR STRATEGY

We are committed to safeguarding the ecological health and resilience of our unique local environment by rigorously monitoring and minimising our emissions to water.

The smelter operates under strict regulatory thresholds designed to protect local aquatic ecosystems and water bodies from adverse environmental impacts.

To mitigate these risks, the site utilises a robust surface water drainage network consisting of a series of interceptors and silt separators. This specialised infrastructure acts as the primary defence mechanism, systematically removing hydrocarbons, suspended solids, and particulate matter from operational runoff. Following this on-site treatment, all treated water is routed through one main discharge pathway.

To ensure continuous regulatory compliance, water quality parameters at this primary discharge point are systematically sampled, tested, and recorded in accordance with our permit schedules. Our internal monitoring protocols track key discharge metrics, including pH levels, temperature, suspended solids, fluoride and aluminium. These critical metrics serve as our primary performance indicators, allowing us to mitigate environmental risk.

# OUR PERFORMANCE

## EMISSIONS MONITORING

Emissions to water data is in-putted into spreadsheets following monthly sampling and analysis, carried out both internally and by a third party.

The below parameters are tested and measured from site discharges to water to assess for compliance against licence conditions.

A summary of sampling results for 2025 is illustrated in the charts below. All results remained within upper and lower permit limits for the year, these are shown in red.



## SOIL & GROUNDWATER PROTECTION

In 2025, we completed a site-wide assessment of our bunds and drainage systems against CIRIA C736 standards to safeguard the ecological health of our local environment. This rigorous review, conducted by an external consultancy, involved multiple site visits, risk assessments, and structural analyses to verify the compliance of our chemical storage facilities.

To ensure our infrastructure remains a robust line of defence, we repeat this assessment every four years, confirming that our secondary and tertiary containment provides sufficient physical barriers to prevent accidental emissions from reaching the ground or water table.

The final report provides a comprehensive summary of our performance and a clear action plan to maintain these high engineering standards, protecting the long-term resilience of our surroundings.

Following this assessment, we have prioritised several key actions to further enhance containment integrity:

- **Structural Remediation** – maintain integrity of secondary containment bunds.
- **Enhanced Monitoring** – refining internal maintenance protocols.
- **Drainage Investigation** – Further investigative work on our complex drainage networks to verify all flow paths.

## DRAINAGE SYSTEM IMPROVEMENTS

In 2025, the business invested in major improvements to the smelter site drainage system, with the installation of three vortex separators for improved sediment catchment across the site.

The design and location of each of these systems was based on extensive site assessments carried out by a specialist external consultant, including drainage surveys, spot sampling data and operations analysis.

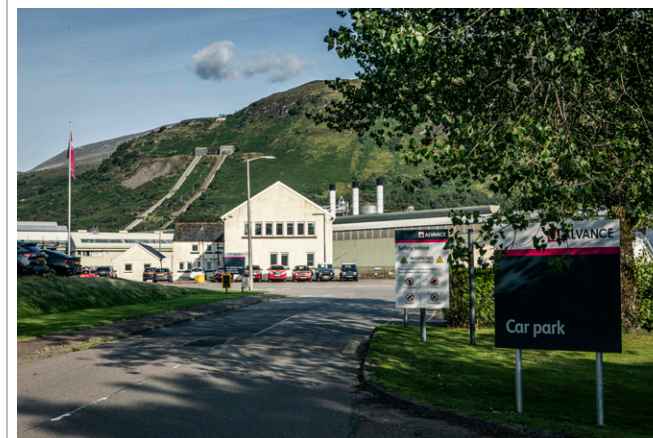
As a result, each vortex separator was strategically placed to ensure maximum opportunity for remediation. These separator units will specifically target contaminants, including suspended solids, hydrocarbons, and carbon dust, which have migrated into the drainage system.

This project will significantly enhance the site's capacity to protect and prevent sediment pollution from entering the wider waterways.



## LOOKING AHEAD

In 2026, the site will undertake a full and comprehensive assessment of the underground drainage system. This will include a CCTV drainage survey, which will allow us to map all flow paths and identify any potential structural vulnerabilities. These investigative works will help refine our site's Incident Prevention & Mitigation Plan, allowing us to identify and implement any additional containment steps required.



### OUR STRATEGY

We don't take our water supply for granted; while water is a renewable resource, we manage it as a critical raw material through rigorous monitoring and planning. We ensure that every litre entering our system is responsibly managed.

Water is the foundational driver of our site operations, directly powering our hydroelectric facility - our primary source of electricity - while providing critical cooling and casting capabilities throughout the smelter.

Operating in one of the highest rainfall regions in Scotland, our infrastructure is uniquely positioned to harness natural water resources to drive low-carbon manufacturing. We manage this resource across an expansive 780 km<sup>2</sup> catchment area governed by established water rights.

To ensure absolute compliance with the strict abstraction thresholds established by the Scottish Environment Protection Agency, our dams and intakes are continuously monitored to prevent over-abstraction, and 100% of the water passing through the system is returned safely to the River Lochy network via a dedicated tailrace.

### OUR PERFORMANCE

#### WATER ABSTRACTION

In 2025, the site directed 937,002,816m<sup>3</sup> of water through the turbines to generate renewable electricity for the smelter.

Water is collected via an extensive network of tunnels, from the Spey through the Grampian mountains to Fort William. It is stored in reservoirs at Loch Spey, Loch Laggan and Loch Treig.

From these upland reservoirs, the water flows down the hillside via giant steel penstocks directly to the power station, where its kinetic energy is harnessed to drive the five generators within the powerhouse. This continuous generation cycle secures the reliable, primary source of electricity required to power our aluminium smelter.

Our infrastructure optimises both major reservoir storage and a network of side-stream intakes. During peak rainfall events, these side streams allow the station to operate at maximum capacity while simultaneously back-feeding surplus water into Loch Treig to maximise storage efficiency. This complex operational network is balanced by a deep commitment to external stakeholders.



A rotary screw trap in the River Spey to safely catch and count young salmon as they swim downstream.

Through proactive community engagement and rigorous monitoring, we maintain strict environmental compliance. Our overarching Water Management Plan binds these elements together, delivering a balanced strategy that aligns social, environmental, operational, and economic priorities.

#### WATER USAGE

Beyond our primary power generation infrastructure, we ensure site-wide water use is sustainable and efficient. The site used approximately 13,640 m<sup>3</sup> of water for utilities in 2025, sourced from Water Plus. All site water is monitored in line with the Water Management Plan.

#### LOOKING AHEAD

Work has started on investigating the use of AI to monitor the accumulated footage of salmon film data to evidence fish movements through the dam. These critical works are imperative for the company as we transition to an updated River Basin Management plan due to be introduced by the regulator SEPA, in 2027.

## BIODIVERSITY

### OUR STRATEGY

We recognise our profound responsibility as stewards of the natural environments surrounding our operations. Through sustainable land management, we are dedicated to protecting biodiversity, building climate resilience, and preserving vital ecosystem services. Central to this mission is our active collaboration with local communities, conservation bodies, and regional partners, working together to deliver meaningful, landscape-scale environmental outcomes.

### OUR PERFORMANCE

2025 marked a strategic turning point for our sister company, JAHAMA Highland Estates, as we accelerated our environmental ambitions. In alignment with Scottish Government policy, the business committed to landscape-scale data collection, rigorous analysis, and evidence-based decision-making to drive ambitious habitat restoration. Throughout the year, our teams focused intensely on environmental data gathering, ground-truthing, and executing the due diligence required to advance our extensive woodland and peatland restoration proposals.

#### NATIVE WOODLAND REGENERATION

During 2025, we consolidated the last three years of estate-wide woodland planning data and applied to Scottish Forestry for one of the UK's largest native woodland regeneration programmes, where we propose to restore the woodlands across our Mamore and Killiechonnate estates.

This ambitious project will build upon our earlier Kinlochleven Woodland Restoration Project, which in 2019 was awarded the new native woodlands award at the 'Scotland's finest woods award' ceremony.

Our Native Woodland Regeneration Project proposal covers approximately 27,000 hectares of our landholdings across Lochaber, with the ambition of restoring approximately 6,000 hectares of native woodland across much of the interior of our upland Lochaber, over the next 10-year period.

Fieldwork for this project involved extensive data collection, carried out by our main ecological consultants Strath Caulaidh Ltd, who completed approximately 8,000 peatland transects at Glenshero and upwards of 450 x 100-metre woodland transects across Mamore and Killiechonnate.

#### HERBIVORE MANAGEMENT

In alignment with our regeneration proposal, we are actively reviewing and intensifying our deer culling operations to safeguard habitat recovery.



A new thermal drone count of the JAHAMA Highland estates area was completed in April 2025 to underpin final population models and target culls. Target densities for the project area are 1-2 per km<sup>2</sup>, with the reductions being implemented over a planned 36-month period.

Sustainable culling of deer numbers protects biodiversity, and by processing this meat for local supply chains we continue to promote a more circular economy. The estates team are involved in the whole process from stalking and gralloching the deer on the hill to butchering the carcasses in the estate larders. As we look to increase culling intensities across the landholding, we are also exploring new opportunities for supplying our venison to the local community.



## BIODIVERSITY

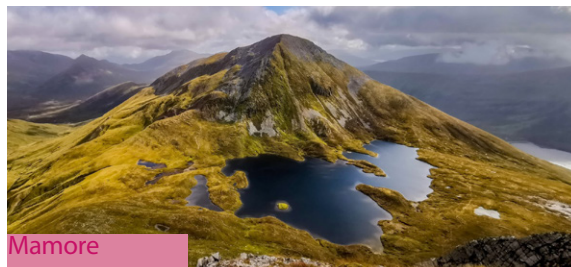


Peatland

In line with Scottish Government policy, we are continuing our work to restore much of the historically damaged and eroded peatlands across our landholdings. Throughout 2025, we actively pursued additional funding support from Peatland ACTION to target some of the most logistically challenging areas of our land, most notably a location known as Tom an Eite - situated high in the Lochaber backcountry behind the Grey Corrie mountain range - as well as rugged terrain across our Mamore Estate. We are delighted that Peatland ACTION has approved our application. We now have a comprehensive plan to restore 115 hectares of peatland across this remote, high-altitude ground, which includes a key section of over 70 hectares in some of the UK's most isolated backcountry. Operational delivery of this project will take place over three years from 2025 to 2028.

### WETLAND HABITAT RECOVERY & RESTORATION

Our work with the British Dragonfly Society continued at pace throughout 2025 and the funding for the restoration of a wetland site at Mamore was finally granted, via the NatureScot Nature Restoration Fund.

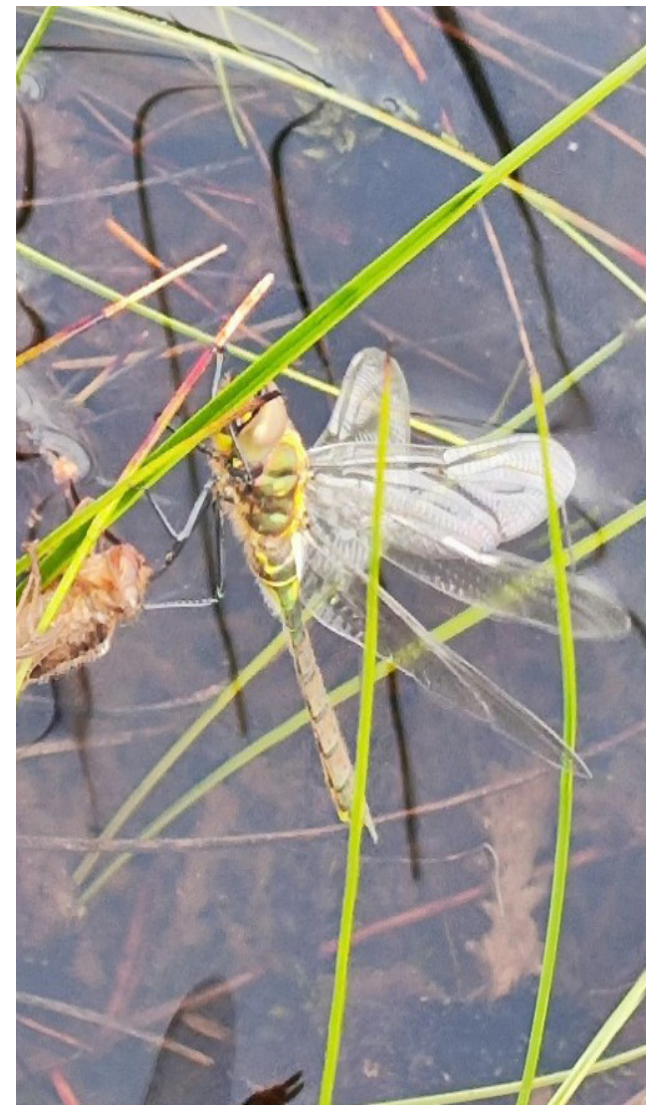


Mamore

Work on the site started in late 2025 and continued into the spring of 2026. Early indications from the British Dragonfly Society team are that the work has been very successful, with local firm Stag Ltd doing a great job on site in challenging conditions.

Recent monitoring by the British Dragonfly Society (BDS) confirmed a new breeding record on the estate: a single Northern Emerald larva. The specimen was located within an area rich in sphagnum moss. This species was not previously known to breed in this area.

Our continued work at this site means that when linked with our neighbouring estate at Corrour, we are a key partner in restoring one of the largest areas of wetland habitat in Europe, in support of our red-listed dragonfly and damselfly species. Our ambition for 2026 is to continue this partnership across a further large area of drying wetland, north of the Blackwater Reservoir.



## WADING BIRD SUPPORT

Our agricultural teams at Glenshero Estate continued with a range of Agri-Environment Climate Scheme (AECS) funded initiatives designed to support key wading bird populations, with a particular focus on the upper Spey catchment surrounding the Spey Reservoir. A range of projects in relation to providing specific wader scrapes, herbivore-related low-level grazing, and hedgerow maintenance were delivered.

To accelerate habitat recovery, we are actively increasing our collaborative engagement with the RSPB and the Cairngorms National Park Authority ranger teams. Together, we are co-developing urgent strategies to enhance and restore critical habitats for essential keystone wading bird species, including curlew, greenshank, redshank, and Northern Lapwing.

### INVASIVE NON-NATIVE SPECIES

In collaboration with the Nevis Landscape Partnership, National Trust for Scotland, Forestry and Land Scotland, and the John Muir Trust, we hosted an Invasive Non-Native Species (INNS) removal training day for our wider Estate team. The session focused on upskilling staff proficiency in targeted chemical stem treatments, which is the best-practice method designated by Scottish Forestry for rhododendron eradication.

Developing a comprehensive understanding of the operational challenges, legal compliance frameworks, and the exact footprint of INNS across our landholdings will allow us to work alongside our neighbouring land managers to deliver the permanent, landscape-scale eradication mandated by the Scottish Action Plan for Invasive Non-Native Species.

## LOOKING AHEAD

- We are delighted to be an active partner in the Nevis Nature Network, which was awarded accreditation and recognition by the Alliance for Scotland's Rainforest this year. We are supporting a funding application submission in 2026, for additional funding for the partnership to further explore how we can collectively work to restore these important woodland areas.
- We aim to help protect the environmentally designated Ben Nevis Sites of Special Scientific Interest (SSSI) by the installation of a strategic sheep stock fence to the north of our landholding to ensure sheep remain within their tenanted areas.



Wader Scrape being installed at Glenshero Estate



Communication & partnerships with local stakeholders is a priority moving forward, so we can collectively work to combat rising challenges, and restore, expand and connect native habitats across our landholdings.

OUR STRATEGY

We minimise environmental risks through proactive operational controls, rigorous root-cause analysis, and continuous system improvements.

We prioritise environmental protection by implementing strict operational safeguards designed to prevent incidents at the source. In accordance with our PPC permits, we operate a comprehensive Environmental Management System (EMS) that outlines clear protocols for identifying, mitigating, and reporting potential environmental variances or incidents. In the event of an incident or anomaly, our structured emergency response plans ensure immediate containment and corrective action to protect the local environment. All incidents - regardless of severity - are systematically logged, investigated, and subjected to root-cause analysis to prevent recurrence.

The company must report any environmental incidents to SEPA within 24 hours, and the reports and their outcomes are also assessed by the regulator. We directly feed the insights from these investigations into our continuous improvement programmes to strengthen our infrastructure, update risk assessments, and enhance employee training.

OUR PERFORMANCE

INCIDENTS

Unfortunately, following a year of no incidents in 2024, during 2025 we had two environmental incidents on site, which we reported to SEPA. Both of which were assessed to have a probable low risk to the environment. These events were thoroughly investigated, and findings were shared across our teams to ensure collective learning.

We treat every event as an opportunity for continuous improvement, using detailed root-cause analysis to strengthen our infrastructure and protocols.

We believe in full transparency when it comes to our environmental performance. The table below outlines the nature of these incidents and our subsequent response.

| Incident Type | Description                                                    | Impact                                                                                                               | Long-Term Action                                                              |
|---------------|----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| Minor Spill.  | Oil drum spillage.                                             | Although the majority of the oil was contained, a small quantity entered the watercourse.                            | Detailed procedures and refresher training on liquid drum handling            |
| ELV breach*.  | Permit exceedance reported during air emissions spot sampling. | Potential for hydrogen fluoride to be released to the environment at a level higher than specified by permit limits. | Increase manual sampling to enable the identification of potential anomalies. |

*\*Following a full investigation, all evidence, including the resampling results, pointed towards a sampling anomaly. It is unlikely this was a true permit breach.*

## ENVIRONMENTAL INCIDENT MANAGEMENT

### NEAR MISS TRAINING

In addition to our reported incidents, we actively encourage the reporting of 'near-misses.' This allows us to address minor equipment wear or procedural gaps before they can escalate.

By capturing these early warning signals, we can perform preventative maintenance and address any high-risk scenarios. This proactive mindset allows us to resolve issues internally, ensuring our primary safeguards remain intact and further reducing the likelihood of any event that could negatively impact the local environment.



### DAANGEROUS GOOD AWARENESS TRAINING

In 2025, operational staff across all departments took part in a specific dangerous goods awareness training course. This training equipped our team with the technical skills to safely manage the loading, unloading, and dispatch of road transport deliveries, including out-of-scope ADR goods.

This will ensure personnel can handle materials safely and respond effectively to potential risks associated with substances used on-site. By equipping key team members with a deeper understanding of chemical properties and hazard identification, we ensure risks are recognised and mitigated before they escalate. This proactive approach adds a vital human layer to the physical barriers used to prevent environmental harm.



# MOVING FORWARD WITH PURPOSE.

In 2026, we plan to do a full and thorough review of our Incident Prevention and Mitigation Plan to ensure we are taking all possible precautions to prevent environmental pollution on site. This will include a rigorous evaluation of our response procedures to oil and fuel spill scenarios, as well as the development of a robust incident response testing regime.

The retiring PCA wagons are pictured beside Loch Treig on the West Highland Line - one of the three reservoirs feeding our hydroelectric scheme. For over 37 years, the fleet travelled more than 50 million miles, equivalent to around 2,000 journeys around the Earth, before completing its final journey in July 2025, carrying shipped alumina from the Port of Blyth to Lochaber Smelter.



The replacement fleet will nearly double payload capacity, reducing annual rail journeys from 107 to 76 - almost 30% fewer journeys - and improving efficiency and environmental performance.



Laggan Dam

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