Environmental and Sustainability Policy

Effective Date: 21st September 2026

1.0 Introduction

1.1 Purpose

At Pliosaur Energy, we recognise our responsibility to protect the environment while developing innovative renewable energy solutions. That principle has shaped our company from the outset and continues to guide the development of our technology and operations.

This approach includes reducing the environmental impact of our activities, supporting the United Nations Sustainable Development Goals and contributing to the UK Government's target of achieving net-zero by 2050.

This Environmental Policy sets out how we will conduct our operations responsibly, continually improve our environmental performance and help deliver our sustainable future. We will promote a transparent reporting and whistleblowing culture to drive continual improvement and deliver industry-leading environmental performance for the benefit of our wider community and the planet.

1.2 Scope of the Policy

This Environmental Policy applies across all Pliosaur Energy activities and to all employees, regardless of role or location. It applies to all company activities, including operations and projects associated with the development, manufacture, deployment, operation and decommissioning of our technology.

The policy also applies to contractors, subcontractors, suppliers and business partners where Pliosaur Energy has operational control or can reasonably influence environmental performance.

All activities within the scope of this policy will be conducted in accordance with applicable environmental legislation, regulatory requirements and other environmental obligations to which the company subscribes.

This policy sets out how environmental considerations will be integrated into planning, decision-making and operational activities. This includes minimising emissions, waste and resource use, protecting marine biodiversity and applying the mitigation hierarchy to avoid, reduce and, where impacts occur, restore or remediate them.

Our goal is to achieve ISO 14001 certification and, where practicable, a net-positive environmental outcome.

2.0 Sustainable Business Practice

We are committed to reducing the environmental impact of corporate activities by employing sustainable business practices.

2.1 Business Travel

Business travel will be reduced wherever practical by prioritising virtual meetings and remote collaboration. Where travel is necessary, employees will use the most environmentally sustainable mode of transport that is practical, with public transport preferred over private vehicle use wherever feasible. Air travel will be limited to journeys where no suitable alternative exists.

Travel arrangements will also take account of employee safety and security, including local risks and the protection of company information, devices and equipment. Environmental considerations will not take precedence over safety or security.

2.2 Training and Competency

Employees will receive appropriate environmental training relevant to their roles and responsibilities. Where specific environmental risks or controls apply, employees and contractors will be expected to demonstrate the competency required to carry out their duties safely and responsibly.

2.3 Controlling Energy Consumption

Pliosaur Energy will use energy and utilities efficiently, reducing unnecessary consumption wherever practicable and implementing measures to improve efficiency. Renewable and lower-carbon energy sources will be prioritised, where appropriate.

2.4 Sustainable Procurement

Procurement decisions will consider environmental performance alongside technical requirements. Preference will be given to suppliers that demonstrate responsible environmental management and low-carbon practices.

3.0 Our Technology

Our technology is intended to support the transition to cleaner, more secure and accessible energy.

3.1 Life Cycle Design

Environmental considerations are integrated into the design and development of our horizontal turbines and arrays. We will seek to reduce environmental impacts across their life cycle, including material selection, manufacture, transport, installation, operation, maintenance, removal and decommissioning.

Where practicable, we will prioritise durable, repairable and recyclable materials and components, with the aim of extending asset life, reducing resource consumption and minimising waste. Our modular design approach will support the replacement or repair of individual components where feasible, reducing the need to replace complete assets prematurely and thereby create unnecessary waste. This design approach supports circular economy principles. We will also seek to work with suppliers that can demonstrate responsible environmental practices.

Our product designs will be reviewed as technology develops to identify opportunities to improve energy efficiency, reduce material use, prevent pollution and lower life cycle environmental impacts.

3.2 End-of-Life Management

We will consider end-of-life requirements from the earliest stages of design. This includes planning for the safe removal, reuse, recycling or responsible disposal of components and materials at the end of an asset's operational life.

Pliosaur Energy will maintain the capability to remove all seabed structures. Decisions on removal will be informed by environmental surveys, consultation with suitably qualified local environmental specialists and applicable regulatory requirements. Where structures have developed ecological value or formed established marine habitats, the environmental benefits of removal will be considered against those of leaving appropriate structures in place.

3.3 Offshore Environmental Design

Where products are deployed offshore, we will seek to design, install and operate them in a manner that minimises disturbance to the marine environment, alongside the biodiversity and environmental assessment measures set out in this policy.

3.4 Ocean Cleanup Capability

Our turbine design incorporates screens that intercept floating debris carried through the overtopping flow path before it reaches the turbine rotor. Debris collected during operation can be recovered during routine inspection and maintenance, helping to remove plastics and other inorganic waste that might otherwise remain within the marine environment.

This capability enables our technology to contribute to cleaner marine environments alongside the generation of renewable energy.

3.5 Waste Management

Pliosaur Energy will seek to prevent and minimise waste throughout the lifecycle of its technology and operations. This includes waste generated through manufacture, installation, maintenance, operation and decommissioning, together with marine debris recovered by our turbines.

Where waste cannot be avoided, materials will be reused, recycled or otherwise recovered wherever practicable. Remaining waste will be handled, stored and transferred responsibly in accordance with applicable environmental and waste-management requirements.

4.0 Our Infrastructure

Pliosaur Energy is committed to minimising the environmental impacts associated with the construction, operation, maintenance and decommissioning of our project infrastructure. Environmental considerations will be integrated throughout the project life cycle to reduce adverse effects on the natural environment.

4.1 Construction and Environmental Management

Our project infrastructure is designed to achieve a high standard of environmental performance, with particular emphasis on minimising seabed disturbance, underwater noise, waste and visual impact. Construction and installation activities will be planned and managed to build on these design principles, reducing greenhouse gas emissions, disturbance to sensitive habitats, sediment movement, water pollution and impacts on biodiversity wherever practicable.

Construction and installation will also be planned to minimise impacts upon the local community. Where activities such as heavy construction are required, measures will be taken to reduce noise and vibration. Concrete and civil works will be managed to prevent wet concrete, cement and wash-out water and alkaline runoff from entering soil, drains, surface water or the marine environment. Contractors will be expected to follow approved working methods and report environmental incidents promptly.

Environmental assessments will inform construction methods and take account of seasonal and location-specific sensitivities. Where impacts cannot reasonably be avoided, appropriate measures will be taken to reduce their effects and, where impacts occur, restore or remediate them.

4.2 Carbon Management

Carbon emissions will be reduced through efficient design and local sourcing. Residual emissions that cannot reasonably be avoided or reduced, such as those associated with cement production, will be addressed through verified carbon offsetting. Pliosaur Energy may obtain Renewable Energy Guarantees of Origin (REGOs) from Ofgem as evidence of renewable electricity generation. Where generation is used to support verified carbon credits, the corresponding REGOs will be retired or otherwise made unavailable in accordance with the requirements of the applicable carbon-crediting standard, programme or registry. The same environmental benefit will not be claimed or sold twice.

Carbon credits will first be retained for retirement against residual greenhouse-gas emissions that cannot reasonably be avoided or reduced. Any surplus credits may be sold. Any REGOs not used to support carbon-credit issuance may be retained, redeemed, transferred or retired in accordance with Ofgem guidance.

4.3 Site Selection and Land Use

To reduce environmental impacts of construction, existing infrastructure and construction sites will be repurposed or upgraded in preference to new development. New facilities will, where required, be located on brownfield sites to minimise land-use change with consideration of previous land-use and potential contamination.

4.4 Future Development Planning

Where initial turbines are constructed, site selection and layout will take account of the potential for future turbine arrays. This will include early consideration of the likely environmental effects of expansion on surrounding terrestrial and marine areas, including cumulative impacts on habitats, species, navigation, landscape, communities and existing infrastructure.

4.5 Commissioning, Testing and Start-up

Commissioning activities, including testing and system start-up will be conducted during daylight hours to minimise the potential impact of noise to the local population. Environmental risks associated with temporary equipment, changing operating conditions and abnormal situations will be assessed before commissioning begins.

Suitable monitoring, inspection and emergency-response arrangements will be maintained throughout commissioning. Any unplanned release or environmental incident will be recorded, investigated and addressed through immediate corrective action.

5.0 Biodiversity

Pliosaur Energy recognises that protecting and enhancing biodiversity is integral to assessing and managing the environmental effects of our activities.

5.1 Environmentally Sensitive Design

Our horizontal turbine arrays are designed with environmental considerations in mind. Their low vertical profile (less than a typical yacht) is intended to reduce potential collision risks for seabirds, minimise obstruction within the marine environment.

5.2 Underwater Noise Management

We will seek to minimise underwater noise, including noise associated with cavitation. Our comparatively low turbine tip speeds are intended to reduce noise and minimise collision risk to marine life. Where practicable, noise-generating components will be enclosed within protective casings. We will continue to monitor emerging evidence and adopt appropriate mitigation measures.

5.3 Marine Species Protection

Array layouts and turbine screening are designed to reduce risks to marine species while maintaining passage through operating sites. Protective screens prevent larger marine mammals from entering the turbine flow path, while the screen aperture is sized to permit passage of fish and smaller marine species.

Local habitats, protected species and key ecological areas will be considered throughout project planning, construction, operation, maintenance, decommissioning and removal.

5.4 Electromagnetic Fields

We will assess and manage potential effects associated with subsea infrastructure, including electromagnetic fields from cables and equipment. Measures such as appropriate cable design, routing, burial or protection will be considered where suitable to reduce potential impacts on sensitive marine species.

5.5 Habitat Protection and Restoration

Where activities affect habitats, Pliosaur Energy will seek to avoid and minimise disturbance and, where impacts occur, restore or remediate affected habitats where practicable and supported by appropriate environmental evidence.

6.0 Environmental Performance Management

Pliosaur Energy will monitor, measure and regularly review environmental performance to identify risks, assess effectiveness and support continual improvement. Significant environmental risks, findings and improvement actions will be recorded through our Environmental Risk Register and wider risk management processes. We will report publicly on our environmental performance, monitor and record relevant public concerns and feedback, and communicate our responses and resulting actions to the wider community to promote accountability and continual improvement.

Environmental monitoring and independent life-cycle assessments will be used where appropriate to evaluate performance and identify opportunities for improvement. Monitoring results, relevant scientific evidence, regulatory requirements and independent third-party recommendations will inform corrective actions and adaptive management practices.

We will remain informed of relevant scientific research, emerging technologies, current and future legislation, and industry best practice, incorporating appropriate developments into our operations where they can improve environmental performance and support ongoing compliance. Independent third parties will be engaged where appropriate to audit or verify our performance.

6.1 Monitoring, Reporting and Continuous Improvement

Pliosaur Energy will ensure that all public environmental claims are evidence-based and supported by recognised assessment and accounting methodologies where appropriate. We will communicate relevant environmental information to stakeholders through appropriate milestone updates, environmental performance summaries, certification status updates where applicable, and notification of material changes to commissioning arrangements, project partnerships or other significant project developments.

This Environmental and Sustainability Policy will be periodically reviewed and updated to reflect project development, regulatory changes, monitoring findings and improvements in environmental governance. Material revisions will be published.

7.0 Roles and Responsibilities

The Directors are accountable for implementing this policy and ensuring that adequate resources and oversight are provided.

Managers and project leads must integrate environmental considerations into planning, procurement and decision-making. They are responsible for identifying environmental risks, implementing appropriate controls, maintaining relevant records and ensuring compliance with applicable requirements.

Employees and contractors must follow this policy and associated procedures, take reasonable steps to prevent pollution and environmental harm, and promptly report incidents, risks, non-compliance and opportunities for improvement.

Environmental responsibilities will be assigned according to competence and authority. Specialist advice will be sought where required, and responsibilities will be reviewed as projects, risks and regulatory requirements develop.

Jerry Trevarthen

Company director