

Harmony Energy Income Trust Plc

Environmental, Social, Governance (“ESG”) Policy (the “Policy”)

Latest version approved and adopted by the board of directors of Harmony Energy Income Trust Plc (the “**Board**”) on 12 September 2023

1. Introduction

Harmony Energy Income Trust Plc (the “**Company**”) is an investment company focused on investing in energy storage and complementary renewable energy generation assets, with an initial focus on a diversified portfolio of utility scale battery energy storage systems (“**BESS**”) in Great Britain.

As an investor in energy infrastructure, sustainability and responsibility sit at the heart of the Company’s investment strategy. The Company aims to generate sustainable value for shareholders whilst supporting the UK’s net zero carbon ambition and contributing to energy security.

The Company recognises that delivering renewable energy projects can also have wider environmental, social, and governance impacts. The Company is committed to actively managing ESG-related risks and opportunities by embedding the consideration of ESG issues into all aspects of its activities. By effectively managing ESG considerations, the Company can help to build a more sustainable and resilient future – both for the Company, as well as for the environment and communities in which it operates.

2. Purpose

The purpose of this Policy is to ensure that ESG considerations are integrated into all aspects of the Company’s activities and investments, with the aim of maximising positive environmental and social outcomes.

3. Scope

This Policy is applicable to the Company from the date of adoption.

4. ESG strategy and focus areas

As a responsible investor, the Company aims to generate sustainable value for shareholders whilst promoting positive environmental and social change. Through its investments in renewable energy and storage infrastructure projects, the Company strives to make a meaningful contribution to the UK’s net zero carbon ambition, whilst also contributing to energy security.

The Company has developed an informed ESG strategy, focused on the strategic areas of climate change, nature and biodiversity, communities, waste and resources and human rights and labour. The strategic focus areas, which align with the UN Sustainable Development Goals (“**SDGs**”), reflect

the Company's priority areas, as identified via a materiality assessment process, regulatory requirements and relevant ESG reporting frameworks.

5. ESG integration

The Company is committed to integrating ESG considerations into all aspects of its investment activities and operations. To ensure that ESG issues are managed effectively, the Company is embedding policies, processes, and procedures to maximise ESG benefits and minimise negative impacts.

The Company will strive to be an active owner, ensuring material ESG considerations are embedded into each stage of the investment lifecycle. As part of its responsible investment approach, the Company will consider both the positive and adverse ESG impacts of the Company's investment decisions, seeking to promote positive impacts and mitigate negative outcomes where possible.

In addition, the Company understands that it has a duty to deliver its day-to-day activities in an environmentally and socially responsible way, by creating and upholding good corporate governance and business ethics, creating a diverse, equitable and inclusive culture and promoting sustainable practices amongst suppliers and partners. By integrating ESG considerations into its corporate governance foundations (and procuring that the Investment Adviser does likewise) the Company strives to integrate sustainability throughout its operations.

6. Reporting and disclosure

The Company is committed to transparent reporting of ESG performance. The Company will publish bi-annual ESG performance updates as part of the interim and annual reporting processes. A set of ESG metrics identified through a materiality assessment process will be reported in the annual report. The annual report will also include reporting against the guidance of the Task Force on Climate-Related Financial Disclosures (TCFD) and the Task Force on Nature-Related Financial Disclosures (TNFD).

As part of its ongoing commitment to the Principles of Responsible Investment (PRI), the Company will complete an annual assessment related to its responsible investment practices.

7. Review

The Company recognises the rapid pace at which ESG best practice is developing. The Company commits to reviewing the content of this Policy at least annually.