

# Environment, Social and Governance (ESG) Report 2021



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# 2 Glossary

BBL/bbl = Barrel

BEIS = Department for Business, Energy and Industrial Strategy

BOE/ boe = Barrel of Oil Equivalent

BRINDEX = The Association of British Independent Exploration Companies

BSCF = Billion Standard Cube Feet

CEO = Chief Executive Officer

CMAPP = Corporate Major Accident Prevention Policy

CNRI = Canadian Natural Resources International

CO<sub>2</sub> = Carbon Dioxide

CO<sub>2</sub>e = Carbon Dioxide Equivalents

COO = Chief Operating Officer

COP 26 = 26th UN Climate Change Conference of the Parties

DANA = Dana Petroleum Limited

DUEM = Durham University Electric Motorsport

EHS = Environment Health and Safety

EIA= Environmental Impact Assessment

ENI = ENI S.p.A Italian multinational oil and gas company

ERCE = ERCE independent energy experts

ESG = Environment, Social and Governance

ETS Emissions Trading Scheme

FAC = First Aid Cases

FSB= Financial Stability Board

GC General Counsel

GHG= Greenhouse Gas

GJ = Giga Joules

GRI = Global Reporting Initiative

GWh = Gigawatt Hour

HSE = Health Safety and Environment

IPIECA = The global oil and gas association dedicated to advancing environmental and social performance across the energy transition

ITPE = ITPEnergised

IUCN = International Union for Conservation of Nature

JV = Joint Venture



Kg = Kilograms

KPI = Key Performance Indicator

LBA - Liverpool Bay Asset

LOPC = Loss Of Primary Containment

LTI = Lost Time Incident

M&A= Merger and Acquisition

MER = Maximising Economic Recovery

Mg/l = Milligrams per Litre

Mm = Million

Mmbbl = Million Barrels

MTC = Medical Treatment Case

MWh = Megawatt Hours

NCP = Ninian Central Platform

NGO = Non-Governmental Organisation

NPAI = Not Permanently Attended Installation

NSTA = North Sea Transition Authority (formerly Oil and Gas Authority - OGA)

OEUK = Offshore Energies UK (formerly Oil and Gas UK - OGUK)

OGA = Oil and Gas Authority (in 2022 renamed to NSTA = North Sea Transition Authority)

OGUK = Oil and Gas UK (in 2022 renamed to OEUK = Offshore Energies UK)

OPEX = Operational Expenditure

OPPC = Oil Pollution Prevention and Control

OPRED = Offshore Petroleum Regulator for Environment and Decommissioning

 $OSI = Off shore\ Storage\ Installation$ 

PON1 = Petroleum Operations Notice 1

PSE = Process Safety Event

RWC = Restricted Work Case

SASB = Sustainability Accounting and Standards Board

SECR = Streamlined Energy and Carbon Reporting

TCFD = Task Force on Climate-related Financial Disclosures

UKCS = UK Continental Shelf



## 3 Introduction

This is Tailwind's second environment, social and governance (ESG) report and covers activities and performance for the 2021 calendar year. This will be remembered as a pivotal year for our industry as the world re-emerged from the global coronavirus pandemic with strong energy demands to support a rebounding economy but also for the re-positioning of all energy related entities toward a far more proactive stewarding of carbon emissions and transparency of reporting. The backdrop of the 26th UN Climate Change Conference of the Parties (COP 26) provided the catalyst for political and industry pledges to meet global carbon targets in order to slow the rate of climate change. COP 26 highlighted the need for the global efforts to accelerate programmes to reduce emissions whilst also highlighting the need for an equitable and just energy transition across the world that will not disadvantage developing countries.

More recently events have demonstrated the need to ensure that energy supplies will be managed and maintained for responsible and stable sources to ensure that the overall national and global energy strategies and goals of net zero can be met. We, at Tailwind, listened and thought about our own contribution to the global goals emerging from COP 26 and how we can play a part.

Tailwind recognises the importance of being a responsible operator and we embrace and recognise the need to rise to the many societal and geopolitical challenges our business faces including our role in the (just) energy transition toward lower carbon emissions to support the UK and global goals of achieving net zero carbon emissions in the future. We recognise our role to provide secure energy supplies from responsible (politically and ESG) operations and to support the energy transition.

During 2021 Tailwind has strengthened our operations through investment to achieve organic growth with project developments, very much in line with the key strategy of the UK North Sea Transition Authority (NSTA -formerly the Oil and Gas Authority OGA), as well as through divestment and acquisition activities while improving our processes in ESG reporting to meet the increased standards expected, by all our stakeholders, for transparency and disclosure. Both government agencies, lenders, industry partners and investors have recognised our efforts in our previous ESG disclosures (2020), but we seek ongoing improvement in our efforts to ensure continued full and accurate representation of our business.

Tailwind is committed to clear and transparent reporting of our business and its associated impacts. To ensure this keeps pace with our stakeholder and wider societal expectations we recognise that our ESG reporting needs to continually evolve and improve. To highlight this our progress with this we have endeavoured to make the following key enhancements to our ESG report for 2021. These are described in detail within the report and are substantiated by the accompanying statements from ITPEnergised and the greenhouse gas (GHG) verification statement from ERCE.



## 3.1 ESG reporting enhancements for 2021:

- 1) Strengthened ESG internal processes in Tailwind (Section 4.1 ESG Strategy and Commitments)
- 2) Stakeholder ESG reviews undertaken with regulators, investors and with Tailwind personnel (Section 3.3 Materiality Assessment)
- 3) Expanded the disclosure reporting standards and frameworks to include:
  - a. Global Reporting Initiative (GRI) (Appendix 2);
  - b. Sustainability Accounting and Standards Board (SASB) (Appendix 3);
  - c. Task Force on Climate-related Financial Disclosures (TCFD) (Section 6.6).
- 4) Reporting of all Scope 1, 2 and 3 emissions by equity share (Section 6.4 Emissions Reporting).
- 5) Improved GHG reporting and forecasting processes developed for statutory and ESG disclosures and for informing future business strategy in M&A activity (Section 6.4 Emissions Reporting).
- 6) GHG disclosures audited by independent verification body ERCE (Section 10 GHG Verification Statement by ERCE).
- 7) All ESG processes and disclosures reviewed by independent consultant (Section 9 Statement by ITPEnergised).
- 8) Improved business governance with the adoption of the Wates Principles (Section 8 Governance).

## 3.2 Organisation Description and Background

Tailwind Energy Ltd (Tailwind) is a privately owned, UK-based, upstream oil and gas company focused on the extraction, production and commercialisation of hydrocarbons on the United Kingdom Continental Shelf (UKCS).

Tailwind was founded in 2016 on the basis of a differentiated business model aiming to identify, acquire and transform oil and gas assets that still retained a high degree of commercial potential but had been underinvested in for a multitude of reasons. Its model is to gear this potential against strict time windows for investment returns whilst mitigating the traditional risks of upstream oil and gas production – namely oil price exposure and asset performance volatility – through partnerships with experienced practitioners.

2021 was Tailwind's highest capital investment year to date with regards to activity. We are continuing to enact on our strategy to exploit organic opportunities as well as take proactive measures to shape our portfolio through M&A activities. Increasingly, we look to our current and future emissions profile as a key metric in taking these investment decisions.

## 3.3 Organisational Strategy – Statement from the CEO

Tailwind's business model, from the outset, has been to maximise the potential of previously under-invested assets. This continues to serve the company well as our strategy has increased our reserves base markedly since the acquisition of our asset base. Our strategy has evolved to ensure we contribute to both the UK's energy security and mix as well as take proactive measures to manage our emissions and environmental responsibilities in line with the North Sea Transition Deal and the expectations of all our stakeholders. This means being part of the energy transition and energy security debate and having our voice heard whilst listening to the expectations and needs of others.

This report builds on our first ESG report and represents an evolution in our performance reporting and review and includes details on how we are pivoting toward a revised outlook to embrace the changing environment in which we operate: this report highlights the areas in which we are doing well in but also the areas in which we continue to improve our ESG performance. We have embraced the need to meet our responsibilities, and this is keenly felt around our workforce with a genuine want and need to make a meaningful contribution to the energy transition. The North Sea has always been at the forefront of the Oil & Gas sector whether through technology deployment, inventive commercial structuring or health, safety and environmental (HSE)



standards. 2021 again presented the North Sea industry with, possibly, its greatest challenge yet to manage the energy transition whilst contributing toward national energy resilience and security for society's needs. Tailwind is positioned well to be a key player in achieving these strategic goals.

The challenges set by our multiple stakeholders are not easy as they often throw up conflicts but as we move through 2022 and beyond, we are committed to making the right choices.

We recognise that the North Sea is not a self-contained ecosystem but is a crucial part of the UK's energy dependency. Within that context, Tailwind provides direct and indirect employment to many people, contributes to the UK Exchequer, and supports many related companies and institutions. As members of Offshore Energies UK (OEUK, formerly Oil and Gas UK - OGUK) and the Association of British Independent Exploration Companies (Brindex), Tailwind is a respected voice and contributor to energy policy development.

I'm pleased to say our ESG reporting is now aligned with TCFD and SASB standards as well as continuing with the GRI standard and we will run our business fully aligned within the framework of both North Sea Transition Deal and the UK's overall net-zero targets.

This report represents the company's efforts in meeting those targets and expectations as well as positioning ourselves as being continually relevant for the energy transition.

## 3.4 Organisational Vision, Mission and Values

Tailwind wishes to be part of an oil and gas sector that works together to optimise near-term assets and enhance the potential of resources in the UKCS whilst adhering to the strictest standards of HSE. We prioritise the facilitation of and execution of safe, sustainable and environmentally responsible ways of working across our operations.

Our model is to identify the many existing oil and gas operations across the UKCS with commercial potential, thus maximising the available natural resources of the UK and to return value to our shareholders. Tailwind is achieving this goal by developing a high-quality portfolio of producing and non-producing assets and projects whilst delivering a strong financial return at the same time. This strategy has been further enhanced through 2021 with the addition of new assets to our portfolio. We continue to look for further opportunities to grow our business in line with our vision and values through 2022 and beyond. We aim to be relevant and meaningful especially against the backdrop of the energy transition whilst supporting the UK's energy security.

At Tailwind, we believe in the value of experience and expertise. Outside of our core knowledge base, we have developed relationships with specialist operational and financial partners to support our business and long-term interests. Whilst we enjoy strong commercial and operational relationships with our partners, our interface and dialogue with government agencies and regulators is as important and we work hard to ensure that these relationships are effective.

We recognise expertise and ambition as key elements to success. Whilst we can draw on our own team of specialists to enable our core strategy, we are continuing to grow external partner relationships to help the company as we look beyond oil and gas as potential growth areas.

## 3.5 Organisational Structure

Tailwind is a privately owned organisation consisting of a maximum of 22 employees in 2021 (reducing to 18 later in 2021) and a number of contractors, depending on the level of operations at the time. All of Tailwind's operations are based in the UK and comply with UK legislation, specifically the Environment Act 1995, which ensures that the Precautionary Principle is applied to all activities.

Tailwind works proactively with regulators, legislators, and partners to ensure we adhere to the appropriate standards of corporate governance and risk management. Our Code of Conduct is a living document that defines the behaviour required from our employees, contractors, and partners. We actively encourage dialogue with the North Sea Transition Authority (NSTA), the Department for Business, Energy and Industrial Strategy (BEIS) and the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) to ensure we are continually meeting the expectations of our stakeholders. This interaction also allows us to provide feedback to regulators and policy makers and to optimise measures for the continued growth of the basin.



Through-out 2021 we have been active in various industry forums focusing on ESG as the momentum builds within our sector to collectively address the challenges of growth and added value in line with wider regulatory and societal objective of emissions reduction and responsible operations.

Tailwind attracts investment from Mercuria – a global energy commodities trader – as a natural partner for our model. Mercuria remains a majority financial beneficiary and shareholder of Tailwind and has board representation at Group level. Mercuria supports our ESG ambition, and its objectives are aligned with our own. To that end, Mercuria assists with the purchasing of UK ETS allowances that Tailwind, as all other net emitters, must purchases to offset carbon emissions from operations.

## 3.6 Reporting Practice and Stakeholder Engagement

Tailwind acknowledges the need for transparency and independently recognised benchmarking of disclosures. We understand the compliance and operational obligations that are demanded of us given the risks and exposure of our operating environment. In 2021 we have focused on developing our approach to ESG benchmarking and have invested time and resource into determining what aspects of ESG are important to us and our stakeholders. Our aim is to ensure that we have a robust and complete understanding of our ESG performance which can then be used to respond to benchmarking organisations.

In our inaugural 2020 ESG report we chose to benchmark our ESG performance against the Global Reporting Initiative (GRI). We have repeated this for 2021 and have also aligned with the Sustainability Accounting Standards Board (SASB) Oil and Gas disclosure. The SASB disclosure represents an industry specific approach to ESG benchmarking and enables us to build our ESG narrative in line with our peers and competitors.

In addition, we have commenced the development of our approach to meet the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). The Taskforce on Climate-related Financial Disclosures (TCFD) was established by the Financial Stability Board (FSB) in 2015 to develop a set of voluntary, consistent disclosure recommendations for use by companies when providing information to investors, lenders and insurance underwriters about their climate-related financial risks.

The TCFD framework focuses on the financial impact of climate change and requires organisations to link non-financial information with financial information.

The recommendations require disclosure of an organisation's risks and opportunities related to the transition to a low carbon economy and the physical risks associated with a changing climate, including the potential financial impact on organisations. This is undertaken through consideration of specific climate scenarios that could be applicable to the disclosing organisation. We believe our approach to the TCFD recommendations will be pivotal to our investors and shareholders in demonstrating our sustainable credentials as our business grows and 2021 represents the start of our TCFD journey.

The Global Reporting Initiative (GRI) is globally recognised as an independent international organisation that helps businesses and organisations to take responsibility for their impacts by providing a common language to reference against. The GRI was selected by Tailwind in 2020 as our initial ESG benchmark as it enables us to communicate our ESG credentials to our stakeholders in a universally recognised way. This report has again been compiled in accordance with the GRI Core Option.

The GRI extends beyond the upstream oil and gas industry and therefore many of its standards are simply not relevant or of material impact to Tailwind's activities and interests. As in 2020, for our 2021 report we have tried to capture all those standards that we deem relevant and material to Tailwind's business and operations through the formalisation and application of a materiality assessment. However, we will continue to review what is material to us as an organisation, the changing environment and expectations of our stakeholders, and GRI's updates to include new standards, or increase coverage of existing standards, as we progress with the development of our ESG strategy.

Tailwind has legal and statutory obligations when it comes to reporting requirements and expected good practice. Tailwind continually updates our stakeholders through formally agreed communication channels with respect to our obligations and, whilst not an exhaustive list, we believe that our key stakeholders and interested parties include our investors, employees, industry and joint venture partners, regulators, (licence partners, supply chain and contractors), financial institutions, peer group and counterpart companies, and



statutory consultees including certain non-governmental organisations (NGOs). Tailwind is pleased to confirm that there were no stakeholder concerns formally raised during the year.

Our approach to materiality, both in the context of our chosen ESG benchmarks and our wider business endeavours, is presented below.



# 4 Tailwind's Approach to ESG

## 4.1 ESG Strategy and Commitments

Our commitment to ESG has ensured it is embedded as a core principle of the company. Environmental management and proactive behaviours are fundamental to Tailwind, and we have grown with good governance and the integration and continuous updating of environmental and social performance into how the company runs and behaves.

Tailwind has a responsibility to our employees, investors, suppliers, regulators, partners and the wider communities in which we operate and influence. Tailwind was conceived as being sustainable, meaning we recognise the importance of the relationships and obligations we have to these different groups. Our public disclosures of our ESG performance helps us and our stakeholders understand the progress we have made, and continue to make, in these areas, and allows us to be transparent about the areas of improvement. ESG performance is critical to Tailwind, as the industry further embraces the energy transition, and ensures we continue to follow a principles-based approach rather than simply obligatory reporting.

Tailwind recognises the sensitivity of our business both in terms of the physical environment in which we operate but also the business and social environment that is constantly changing. The energy transition is emerging as the main focus for the oil and gas sector, particularly with regards to the management of carbon emissions and re-balancing of the energy mix but also how this aligns with the need to provide energy security. This continued to be the case in 2021 as the world responds to changing energy needs and emerges from the COVID pandemic. Already in 2022, we are seeing the increase focus on the requirement for maintaining a secure, national energy supply which Tailwind's business model fundamentally supports.

Our Leadership Team and Board recognise ESG aspects as central to how we do continue our business and how our strategy and operations must continually adapt to a changing landscape. We are members of Offshore Energies UK (OEUK), Brindex and interact with the North Sea Transition Authority (NSTA formerly OGA) regularly to contribute to the strategy and debate that ultimately sets policy to ensure the safe and reliable operations that the oil and gas industry brings to the UK economy.

In March 2021 OEUK members agreed the North Sea Transition Deal with the UK Government. This deal requires that the net UK carbon account meets the Net Zero target by 2050 which is set out in the Climate Change Act 2008 (as amended) and defined in the North Sea Transition Authority Net Zero stewardship expectation 11.

Tailwind supports the OEUK target to achieve a net zero basin by 2050 with interim targets to reduce the 2018 overall North Sea Oil and Gas production emissions by 50% in 2030 and 90% by 2040. To support these regional targets, Tailwind are committed to supporting joint venture (JV) partners and UK Government to developing and funding emissions reduction and transition plans wherever we operate or have production or equity interest.

Recognising the importance of strong, long-term ESG governance to our business, Tailwind appointed a permanent ESG Manager in 2021 to ensure that the business is prepared to meet the evolving future demands of ESG best-practice for reporting our performance and ensuring we strive to be a sustainable business. This demonstrates our commitment to meet the highest ESG standards for our operations while significantly contributing to the UK's energy security from responsible operations committed to meet the industry net zero goals.

## 4.2 Stakeholder Identification and Mapping

In 2021, Tailwind began taking a formal approach to stakeholder identification and mapping. We recognise that many of our key stakeholders are regulators and from the investment community, however, to ensure that the full spectrum of our stakeholders is understood in the context of both our current operations and the wider energy transition, we felt it important to formalise this process.



Our own executives, managers and employees as well as customers, suppliers, civil society organisations and the general public are all examples of stakeholders with the potential to take an interest and influence the ESG performance of Tailwind.

This formal process also ensures that the material ESG elements we measure and report on are those that enable us to manage our business responsibly as well as respond in a meaningful way to our stakeholder interests. It also supports and enables us to engage meaningfully with the wider oil and gas sector in the UK when addressing material issues that affect the whole sector.

The stakeholder mapping work formed part of our wider materiality assessment process which is outlined below.

## 4.3 Materiality Assessment

In 2020 Tailwind's approach to materiality was driven by the process for developing a GRI disclosure. It was recognised at the time that a robust internal process for identifying, assessing and communicating what is important from an ESG perspective to the Tailwind organisation would be central to future ESG reporting and disclosure.

Throughout 2021, we have worked to develop our materiality assessment process to ensure that it reflects our organisation and the sector in which we operate. It is also important that the process of determining what is material is not onerous or over-complicated and to that end we have built our approach based on guidance and reference material that is well developed and respected in the sector, specifically from the NSTA, OEUK and IPIECA.

It is imperative to recognise and conform with the assessment of materiality as set down by benchmark organisations such as the GRI, however it is equally important to Tailwind that our materiality assessment reflects our business and is not driven by the desire to align specifically with any one benchmark or standard.

Ownership and accountability for material issues identified through this process is held with the Board of directors and action is delegated through the senior management team.

As a result, Tailwind has undertaken a systematic and thorough materiality assessment covering all ESG issues material to Tailwind and our stakeholders, and that these are covered in the resulting disclosures with this report.

## 4.4 Data Collection and ESG Benchmarking

Building on the approach to ESG transparency commenced in 2020, Tailwind has worked to evolve a data book for all ESG metrics associated with its operations in 2021. This data book ensures that Tailwind captures relevant data points for all material aspects of ESG relevant to its activities as identified by the materiality assessment process.

In addition, the data book will continue to evolve over time to ensure that ESG related activity data is captured in a central repository to aid disclosure to stakeholders as well as providing a source of reference for the ESG benchmarks Tailwind chooses to disclose under.

In 2021, Tailwind has again developed a Global Reporting Initiative (GRI) disclosure and has additionally produced a disclosure aligned with the Sustainability Accounting Standards Board (SASB) Oil and Gas standard disclosure.



# 5 Operations

Tailwind's assets are managed under different operating models. This approach enables value to be maximised on an asset-by-asset basis and ensures that operational and financial risk exposure can be reduced.

Having multiple joint venture operating models can be challenging when considering ESG reporting, as the legal accountability for ESG aspects does not always rest with Tailwind but with the operating company responsible for day-to-day management of the asset. However, with the maturation of reporting standards and the influence of NSTA, most UK continental shelf (UKCS) operators are prioritising disclosures and benchmarks in line with Tailwind's approach to adopt SASB and TCFD as well as promoting common key performance indicators (KPIs) such as emissions intensity.

Tailwind's approach to ESG accountability is to take a representative, or equity, share of ESG accountability wherever this is practical to ensure that the wider ESG strategy applies to its whole business rather than just those elements for which it has legal responsibility. This is a transparent and open approach that shows Tailwind accounting for its equity share rather than utilising any shield of reporting boundaries.

Tailwind currently has three main areas of operation on the UKCS, Triton, Columbus, Orlando as well as Conwy and Orlando for parts of 2021. Triton subsea fields, Orlando and Columbus are produced over facilities that are operated and managed by Dana Petroleum Limited ("Dana"), CNR International (CNRI) and Shell UK respectively.

Conwy is a not permanently attended installation (NPAI) which was owned and operated by Tailwind for part of 2021 with production and supporting services associated with the Douglas Field provided by ENI UK Liverpool Bay Asset (LBA).

In addition to these producing assets, Tailwind has undertaken well operations during 2021 through the appointed well operator Petrofac Facilities Management Limited and site surveys with specialist vessel contractors.

For the 2021 ESG report we have also included operated and non-operated activities within our disclosures as defined.

Asset	Operator	<b>Equity Share</b>	Scope of Emissions
Triton – Bittern Field	Dana Petroleum Ltd	64.63%	Scope 3
Triton – Gannet E Field	Dana Petroleum Ltd	100%	Scope 3
Triton – Guillemot W&NW Fields	Dana Petroleum Ltd	10%	Scope 3
Triton – Evelyn Field	Dana Petroleum Ltd	100%	Scope 3
Triton – Belinda Discovery	Dana Petroleum Ltd	100%	Scope 3
Columbus	Shell UK	25%	Scope 3
Orlando	CNR International	100%	Scope 3
Conwy (divested June 2021)	Tailwind	100%	Scope 1

Table 1: Tailwind Operations Summary

#### 5.1 Triton

The Triton Area consists of six producing oil fields developed via common infrastructure in the UK Central North Sea, located approximately 190km east of Aberdeen in water depths of 90m. The six fields currently producing oil and gas via the Triton Floating Production, Storage and Offloading vessel (FPSO), are Bittern, Guillemot West & Guillemot Northwest, Gannet E, Clapham, Pict and Saxon. Dana and Waldorf Production UK Limited ("Waldorf") are our partners in the Triton cluster. Dana operates the Triton FPSO along with the Bittern, Clapham, Saxon, Pict and Guillemot West fields. Tailwind is operator of the Gannet E Field, with Dana as pipeline operator and Petrofac as well operator.



Tailwind also are licence holder for the Belinda/Evelyn discoveries and in 2021 worked with our appointed well operator Petrofac to drill the Evelyn development well and decommission the abandoned Belinda well. Upon successful tie-in and subsequent first production from Evelyn in 2022, the Triton Area will have expanded its portfolio of producing fields to seven.

#### 5.2 Columbus

The Columbus Field is in blocks 23/16f and 23/11a, approximately 35km northeast of the Shell-operated Shearwater platform which processes Columbus production. The Columbus FDP was sanctioned in Q4 2018 and during March-July 2021 drilling was undertaken by Serica with the Maersk Resilient rig with first production achieved in November 2021. Tailwind holds a 25% non-operated interest in the Columbus development.

#### 5.3 Orlando

On the 8<sup>th</sup> of June 2021 Tailwind completed the purchase of Decipher Energy Limited which included its interests in licences in the Greater Ninian area. The only licence currently developed is the Orlando subseatieback in UKCS Block 3/3b, approximately 11 km east of the Ninian Central Platform operated by CNRI. All Orlando production is processed at Ninian Central. Following completion of the Decipher acquisition, all 2021 Orlando production was booked to Tailwind.

## 5.4 Conwy

The Conwy Field is located within Block 110/12a in the East Irish Sea, approximately 33km North of Llandudno, North Wales. Conwy is a 12km tie-back to the ENI UK LBA-operated Douglas Field installation in adjacent block 110/13b. On the 8th of November 2018 Tailwind completed the acquisition of EOG's UK business which included a 100% operated interest in the Conwy Field.

The Conwy asset was divested to ENI by Tailwind on the 30th of June 2021 including all future liabilities associated with decommissioning. We have reported part-year information for the continued operation and ownership of Conwy in our 2021 ESG report, however the asset is no longer part of our portfolio.

## 5.5 Site Surveys

During 2021, vessel site surveys were conducted at the Orlando field using a contract survey vessel supplied by Deep Ocean for a routine integrity inspection at Orlando, and at the Evelyn development, Orlando field and Gannet E field a Fugro survey vessel was contracted to undertake a site survey in preparation for future project work.



## 6 Environment

## 6.1 Environmental Accountability

As reflected in our 2020 report, Tailwind has continued to operate to the high standards of environmental accountability through industry specific legislation in 2021. We are aware that our licence to operate requires us to go beyond compliance to ensure that our business supports the wider societal and government ambition to achieve net zero emissions and minimise our environmental impact wherever possible.

Environmental due diligence is becoming increasingly important to shareholders, employees and financial institutions and Tailwind strive to ensure we remain a responsible operator and partner.

Through our joint venture partnerships and industry affiliations, we seek to vocalise our credentials and ambitions and influence the wider industry in line with our own environmental aims and objectives. In line with Tailwind's wider approach to ESG, it is anticipated that this will lead to dedicated environmental targets and KPIs as the strategy develops.

## **6.2** Environmental Management

Tailwind has an Environmental, Health and Safety (EHS) Policy that publicly discloses our commitment to environmental accountability and compliance. An Environmental, Health and Safety Management System, Environmental Management Process, Legislative and Regulatory Compliance Process, and dedicated HSE Manager ensure Tailwind can meet our environmental compliance requirements with respect to all aspects of our operations. In 2021, Tailwind had no non-compliances with any environmental laws or regulations.

Tailwind's EHS Policy and associated Management System is externally assured every 2 years (next review due in 2022) and is compliant with ISO 14001:2015 environmental management standard. The EHS Policy is regularly reviewed by the Board of directors and signed by the CEO. The Environmental Management Process and Legislative and Regulatory Compliance Process are regularly reviewed and signed by the Chief Operating Officer and the General Counsel respectively.

The material environmental aspects managed by Tailwind are described below. Emissions and our wider approach to the energy transition and net zero are described in Environmental Accountability Section.

#### 6.2.1 Chemical Management

During the extraction of offshore oil and gas, chemicals are required to support both exploration and production activities. These chemicals if permitted, through approved regulatory permits, can be legally discharged into the marine environment when supported by an Environmental Assessment Justification (EAJ) and Chemical risk assessment.

Tailwind is accountable to the regulator (BEIS) for all chemical permits and management on our operated assets. The legal accountability for chemical management associated with host facilities to our operations rests with the host facility operator (Dana for Triton, Shell/Serica for Shearwater/Columbus and CNRI for NCP/Orlando).

All chemicals, used for the extraction and production of oil and gas, that require permits are registered in accordance with the Offshore Chemicals Regulations 2002.

Our EHS Management System ensures that we can meet our regulatory compliance requirements with respect to all offshore materials and chemicals as required by the UK Offshore Chemical Regulations, an instrument of the Environmental Protection Act. All chemical use and discharge on Tailwind assets are carried out under permits and consents and are supported by environmental assessments (EA's) and chemical risk assessments which are assured and approved by the UK Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) which is part of the Department for Business, Energy and Industrial Strategy (BEIS).

Tailwind had an approved permit for the Conwy asset for the use and discharge of six specified chemicals associated with production from the asset. During the period Tailwind operated Conwy in 2021, 930kg of brine was the only chemical used with none of this being discharged to the environment.

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Tailwind is obligated to report any unintended or unpermitted discharge of hydrocarbons or other pollutants to sea. Any infraction must be logged and submitted to OPRED under a Petroleum Operations Notice 1 (PON1) notification. In 2021, Tailwind had zero unintended or unpermitted releases to the marine environment.

#### 6.2.2 Energy

Energy generation and consumption are required for the offshore production of oil and gas as well as the onshore services provided by Tailwind to support this, including offices. Tailwind recognise that energy generation and use have a financial impact on the organisation, as well as an environmental impact through the generation of greenhouse gases. When considering energy use reporting, Tailwind accounts for both operated and non-operated assets, with non-operated assets being considered on an equity share basis.

Energy use is a business requirement to ensure safe operations from Tailwind assets. Energy management and optimisation is synonymous with efficient operations.

Energy is consumed by Tailwind in our offices as well as on offshore installations. In 2021, Tailwind consumed a total of 196,762 GWh of energy across the organisation. This includes energy used for Conwy operations (52 GWh) and Tailwind's production/equity share across Triton (142 GWh) and Orlando (2.8 GWh). Energy used for the 2 months of Columbus production in 2021 was not available from the Shearwater facility operator in 2021. Onshore energy included the London and Aberdeen offices (107 MWh) where the London office electricity is supplied by a 100% renewable energy tariff certified by the Carbon Trust and compliant with the Greenhouse Gas Protocol guidance and therefore contributes towards the UK's renewable energy sector and decarbonising grid electricity. The Aberdeen office was closed after the end of 2021, creating energy savings from 2022 onwards.

Tailwind's energy intensity can be defined as the energy consumed in MWh per unit of offshore oil and gas produced in tonne oil equivalent (toe). Based on the equity share approach and production for each asset, Tailwind achieved an overall average intensity of 0.27 MWh/toe, which included Conwy (0.72 MWh/toe), Triton (0.23 MWh/toe), Orlando (0.08 MWh/toe), and the London and Aberdeen offices.

#### **6.2.3** Water

During the extraction of offshore oil and gas, sea water is used in various process and cooling operations. The impact of water use and effluent discharge on the environment can be significant if not managed correctly and Tailwind has identified this as a material topic for our business.

Tailwind operated the offshore Conwy oil installation that utilises sea water injection to displace oil in subsurface reservoirs which is brought to the surface by the production wells. During these operations, oil contaminated water, i.e., produced water, is reinjected into the Douglas reservoir. Any residual water in the oil stream is separated at the Douglas OSI storage vessel and discharge may occur to the marine environment. This is carefully monitored on the ENI operated Douglas receiving facility as well as the OSI and oil contaminated water is discharged in accordance with an Oil Discharge Permit.

The discharge of any effluents is carefully regulated, monitored and managed to limit any impacts on the environment. Water-related impacts are identified through compliance with the UK Environmental Impact Assessment Regulations and the Offshore Chemical Regulations 2002.

Tailwind is permitted to discharge produced water overboard in accordance with Oil Pollution Prevention and Control Regulations 2005 (OPPC) where the concentration of dispersed oil in produced water discharges (as averaged over a monthly period) must not exceed 30mg/l. Due to the operational arrangements of the Conwy asset, produced water was managed on the Douglas OSI facility and the OPPC permit is held by ENI UK LBA.

The preferred method for disposal of produced water for the Conwy asset was through re-injection into the Douglas reservoir, however when this route was operationally unavailable, the produced water was routed to the OSI where a permit was in place to allow oil in water of a concentration lower than 30mg/l to be discharged overboard.

#### 6.2.4 Biodiversity

Tailwind consider biodiversity to be of material importance to our operated and non-operated assets. We help manage the conservation of biodiversity through the direct control of operated offshore assets and through operational influence with our joint venture partners of our non-operated offshore assets.



Tailwind manages the impact we have on biodiversity primarily through compliance with UK offshore environmental legislation which is derived from EU directives. Tailwind understand the current industry focus on the conservation of biodiversity on the UKCS.

All Tailwind assets are subject to compliance with the Environmental Impact Assessment Regulations 2020 which ensures that permits and consents are approved by BEIS prior to issue for compliance with biodiversity requirements. New developments, and exploration and appraisal infrastructure, are subject to full environmental impact assessments (EIA) which specifically consider biodiversity.

The EIA is a key component of the UKCS licencing, consenting and permitting process. Impacts are examined in both environmental statements and in the environmental assessments accompanying permit applications. Tailwind operates in full compliance with these requirements.

Of particular importance when assessing the potential impact on biodiversity of UKCS operations is consideration of International Union for Conservation of Nature (IUCN) Red List species. This list of species represents the world's most comprehensive inventory of the global conservation status of plant and animal species. It uses a set of quantitative criteria to evaluate the extinction risk of thousands of species. None of Tailwind's operations in 2021 were assessed to have a significant impact on any IUCN Red List species with a single IUCN species potentially impacted in the vicinity of Conwy platform operations. This risk was assessed and deemed insignificant in all approved regulatory permit applications for Conwy with the strict environmental controls in place.

#### **6.2.5** Waste

During the extraction of offshore oil and gas, waste and effluents are generated both as by-products and waste associated with support services and processes. The impact of waste and effluents on the environment can be significant if not managed correctly. Tailwind manages waste associated with the Conway asset where we are legally accountable to the regulator for waste and effluent management. Waste from onshore office operations is coordinated by a facilities contractor through the rental arrangements in place.

Waste and effluent generated on the host facilities to our operations is managed by the legally accountable operator (Dana Petroleum for Triton, CNRI for Orlando and Serica/Shell for Columbus).

Waste management regulation in the UK is of the highest standard and it is not possible to delegate the ownership of waste at any stage. Tailwind supports this "polluter pays" principle and closely managed waste on the Conwy asset. None of the general offshore waste generated on Tailwind assets went to landfill in 2021.

Tailwind assets are subject to regular waste management audits. Tailwind regularly monitor our supply chain to ensure compliance with waste and effluent handling and disposal.

In 2021, Tailwind operations were responsible for:

- 0.55 tonnes of hazardous waste which was subject to energy recovery, and
- 0.64 tonnes of non-hazardous waste which was recycled.

While it is not possible to directly compare waste management performance across the UKCS due to variations in operating conditions and operational demands, it is encouraging that Tailwind did not send any offshore waste to landfill in 2021.

## 6.3 Energy Transition and Net Zero

Tailwind has embraced the challenge of the energy transition and the net zero emissions ambition of the UK Government, as part of Offshore Energies UK (OEUK) and in collaboration with our peer companies on the UKCS.

The context for Tailwind however, is different from others in the sector, particularly those of scale and diversity of business interests. Tailwind operates in the upstream space only and traditionally therefore cannot commercially pursue initiatives open to those companies with an integrated business platform that allows diversification into renewable energies such as solar or biomass, repositioning of refineries toward biofuels and investing in hydrogen and carbon capture projects.

Tailwind's focus remains within one space to make best use of its knowledge and experience, by maximising recovery from assets where others cannot. Tailwind's contribution is a valuable part of the energy transition



roadmap, making space for other companies to focus on renewable energies. However, Tailwind has commissioned a specialist study and report to scope out the viability of taking equity positions in Nature Based Solutions (NBS) initiatives and businesses. We have and will continue to investigate participation in carbon sink or capture projects that align with sustainable good practices and commercial objectives.

In addition, we will take accountability of the Greenhouse Gas (GHG) emissions associated with our activities not only through regulatory compliance but also through an equity share of GHG's associated with our non-operated assets managed by our joint venture partners and more recently, Tailwind has been exploring emerging opportunities that we can invest in that could neutralise our emissions and thus support the UK goal to achieve Net Zero by 2050.

### 6.4 Emissions Reporting

COP26 and the growing focus on the impacts of climate change in 2021 have increased the scrutiny of how all business sectors of the economy quantify, report and manage emissions. Our approach to emissions has evolved significantly in 2021, with investment made to better understand our emissions footprint across our operations and development of a standard, transparent approach to reporting our emissions associated with various asset operating models.

At Tailwind, we are focused on going further than quantification and reporting. We continue to drive emissions reductions and efficiency in the assets we operate, and those in which we are non-operating partners, through a combination of direct action and joint venture influence.

In addition, in 2021 we have commenced the process of aligning our business to the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). We recognised that emissions offsetting has a place in addressing both emissions which will take time to reduce and those which cannot be avoided. Tailwind therefore commenced work in 2021 to understand how we can best neutralise our residual emissions in a manner which aligns with our wider business strategy.

#### 6.4.1 GHG Protocol Equity Share Approach

Our first ESG report reflecting on 2020 introduced the Tailwind method of taking an equity share approach to the ownership of emissions across our operated and non-operated portfolio. In 2021, we have further refined this method to ensure we can align our reporting and emissions quantification with our chosen ESG benchmarks as well as the Greenhouse Gas (GHG) Protocol¹. Aligned with the GHG Protocol and where applicable, Tailwind account for all six greenhouse gases covered by the Kyoto Protocol: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulphur hexafluoride (SF<sub>6</sub>). Tailwind account for additional gases with emissions data provided by operators from EEMS reports, including nitrogen oxides (NO<sub>X</sub>), sulphur dioxide (SO<sub>2</sub>), carbon monoxide (CO), volatile organic compounds (VOCs), and halogens. The latest UK Government's BEIS Greenhouse Gas 2021 Conversion Factors and the latest Global Warming Potential (GWP) rates from the Intergovernmental Panel on Climate Change (IPCC) are used to calculate emissions where primary emissions data has not been provided.

The approach to equity share that Tailwind has adopted is an appropriate interpretation of the GHG Protocol which recognises the UK regulatory reporting requirements. To avoid "double counting" of scope 1 emissions across UKCS operators, equity share emissions of non-operated host facilities are reported under scope 3, while assets for which Tailwind has operational control are reported under scope 1 emissions.

This approach ensures direct alignment with the UK Emissions Trading Scheme (ETS) and Streamlined Energy and Carbon Reporting (SECR) regulatory requirements as they require direct scope 1 emissions to be reported by entities with operational control – our operating partners.

Tailwind believes that this approach ensures we take accountability of all emissions across our operations in a manner that is consistent with internationally recognised standards and demonstrates our credentials as a responsible operator.

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<sup>&</sup>lt;sup>1</sup> Tailwind's 2021 scope 1, 2 and 3 emissions disclosures have been independently verified by ERCE to be in accordance with the procedure recommended in the GHG Protocol "[The GHG Protocol: A corporate reporting and accounting standard (Rev March 2004) and the principles if ISO 14064-3:2019.



Emissions intensity, measured in kilograms of CO<sub>2</sub> equivalent per barrel of oil equivalent produced remains a core oil and gas industry metric for benchmarking performance on emissions and efficiency management as well as demonstrating relative performance between peers.

In 2021, our emissions intensity across all our portfolio of Scope 1, 2 and 3 activities (drilling, project, production and onshore activities) was 30.94 kgCO<sub>2</sub>e/boe compared to 34.80 kgCO<sub>2</sub>e/boe in 2020.

The 2021 emissions intensity for our producing fields is shown in Figure 1 below and has been benchmarked with information provided in the OGA (NSTA) Emissions Monitoring Report October 2021<sup>2</sup>.

This shows that although Tailwind's 2021 average production intensity is above the average UKCS intensity of 20.00 kgCO<sub>2</sub>e/boe, the majority of the Tailwind producing fields have emissions intensities close to the average UK production facility emissions intensity.

The notable exception to this was the Conwy platform which had an increased emissions intensity from previous years as a result of reducing efficiency of the mature Conwy asset with reducing production despite having similar or increasing energy demands.

As previously described, Conwy produces through the Douglas infrastructure which is a large legacy facility that no longer operates at the same production levels that it was designed to operate when at peak rates and therefore Conwy had a resultant relatively high emissions intensity of 66.18 kgCO<sub>2</sub>e/boe.

The Triton field intensities of 23.03 kgCO<sub>2</sub>e/boe are more in-line with the average emissions intensity for UKCS operations. However, it should be noted that FPSO operations such as Triton generally have higher relative intensities due to increased power demand for ship-based systems. Triton therefore compares well for emissions intensity sitting in the top half of best performers in its floating facility infrastructure grouping which otherwise have emissions intensities significantly higher than the UKCS average 20 kgCO<sub>2</sub>e/boe defined in the OGA Emissions Monitoring Report 2021.

The Orlando field intensity of 17.80 kgCO<sub>2</sub>e/boe is below the average emissions intensity for UKCS operations. The Orlando emission share of the CNRI Ninian Central Platform (NCP) is based on the proportionate production share of total production fluids produced over NCP. The relative NCP production share is anticipated to increase in 2022 following a well workover which could increase Orlando's future intensity in the future.

The Columbus field intensity of 17.29 kgCO<sub>2</sub>e/boe is below the average emissions intensity for UKCS operations but it should be noted that the intensity is based on estimated emissions from production for the 2 months Columbus produced over the Shearwater facility in 2021. This value may change in future reporting which will be based on regulatory EEMS reporting (consistent with Tailwind's other GHG reporting) when the data is available from the Shearwater operator.

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 $<sup>^{2}</sup>$  Oil and Gas UK (NSTF) – Emissions Monitoring Report October 2021



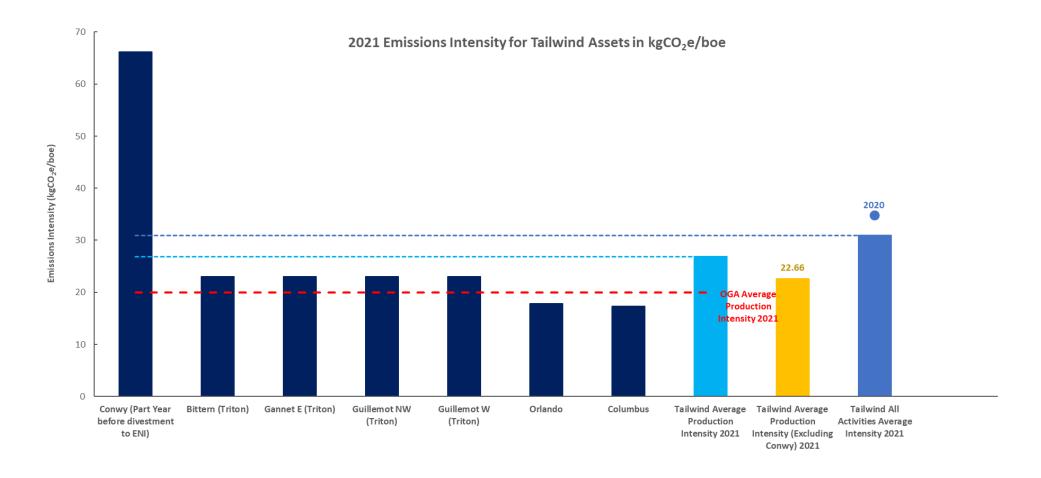


Figure 1: 2021 Tailwind Emissions Intensities

Tailwind Energy ESG Report 2021



#### **6.4.2** The UK Emissions Trading Scheme

To demonstrate financial commitment to our equity share approach, Tailwind continues to participate, indirectly, in the UK Emissions Trading Scheme (UK ETS) via our operating partners Dana, ENI and CNRI as well as direct purchasing via Mercuria as an investor and subject matter expert. On an operated basis, for the Conwy asset Tailwind was deemed a low energy user and while bound to the Streamlined Energy and Carbon Reporting (SECR) initiative, did not meet reporting requirements for UK-ETS. The emissions that are included in this report are also included ENI, Dana and CNRI's ETS disclosures. Furthermore, even though we show an overall emission value for Tailwind's production this is in fact also included on Dana, ENI and CNRI reporting of emissions.

Dana, ENI and CNRI are allocated credits from the UK-ETS (2021) which can be subsidised under a cap-and-trade arrangement within the scheme. Dana, ENI and CNRI recover these costs from Tailwind under opex share and tariff arrangement where applicable.

#### **6.4.3** Independent Verification

In 2021, Tailwind engaged an independent consultant ITPEnergised to formalise its approach to emissions quantification and reporting. This work culminated in the development of an emissions model which reports Scope 1, 2 and 3 emissions as defined by the GHG Protocol and interpreted to reflect the regulatory landscape of the UKCS.

Furthermore, Tailwind had the emissions data for 2021 independently verified by ERCE to support robust transparency of disclosure to our stakeholders including our equity partners and lenders. ERCE's Verification Statement is in Section 10 of this report.

#### 6.4.4 Tailwind Emissions in Detail

In 2021, we were responsible for 34,912 tonnes of CO<sub>2</sub>e of Scope 1 emissions through the Conwy operational asset. Our Scope 2 (location-based) missions were 25 tonnes of CO<sub>2</sub>e from purchased energy (electricity and gas) for our offices. As Tailwind's London office is supplied with a certified 100% renewable electricity tariff, Scope 2 emissions excluding the renewable electricity were 11 tonnes of CO<sub>2</sub>e. While our largest footprint is from our Scope 3 emissions associated with our non-operated assets and business travel at 133,261 tonnes of CO<sub>2</sub>e, we take equity accountability and the associated emissions trading costs of these through our joint venture and operating partnerships. Table 1 summarises and compares Tailwind's GHG emissions for 2020 and 2021.

Scope	Description	2021 (Tonnes CO <sub>2</sub> e)	2020 (Tonnes CO <sub>2</sub> e)
1	Direct emissions from Tailwind's controlled operations	34,912	83,543
	Indirect emissions from the consumption of purchased energy in Tailwind's onshore office facilities	25	9.23
2	Indirect emissions from the consumption of purchased energy in Tailwind's onshore office facilities (excluding purchased energy from certified renewable sources)	11	0
3	Indirect emissions from Tailwind's non-operated activities using an equity share approach and business travel	133,261	99,726
Total Emissions		168,197	183,278
Total Emissions (Less certified renewable energy)		168,183	183,269

Table 2: Tailwind's Greenhouse Gas Emissions: 2020 & 2021



As can be seen in Table 2 above, Tailwind has reduced the overall carbon footprint by 15,081 tonnes of CO<sub>2</sub>e, which equates to a reduction of 8.2%<sup>3</sup>. Tailwind's portfolio of assets has changed throughout the year resulting in a reduction in Scope 1 emissions of 48,631 tonnes CO<sub>2</sub>e (58%) and an increase in Scope 3 emissions of 33,535 tonnes CO<sub>2</sub>e (34%). Scope 2 emissions have increase by 15.8 tonnes CO<sub>2</sub>e (171%), largely due to the inclusion of an additional Aberdeen office (since closed), the inclusion of electricity and gas for the London office (2020 included only electricity) and possibly some COVID-19 restrictions easing in 2021 and the return of Tailwind employees working in offices.

Continuous improvement in reducing emissions on the non-operated asset, Triton, has been underway as part of a 2020 Triton Asset Life Extension study. Several emission reduction measures were identified in 2021 and Tailwind as an equity partner has committed capital expenditure through the joint venture to support these improvements summarised in Table 3 below. In addition, where Tailwind production occurs over non-operated assets, we seek to continually support improvements on these assets through a better understanding of the asset processes and emissions as well as future plans to reduce the asset emissions. While we have limited influence over emissions on host facilities where we have a tariff agreement (CNRI and Serica/Shell) rather than a joint venture agreement, we have engaged with CNRI to understand their plans to reduce Orlando share of NCP emissions and we are developing a better understanding of the Columbus/Shearwater emissions in 2022.

<b>Emissions Reduction Strategies</b>	Triton
Combustion Emissions	<ul> <li>Commenced Emissions reduction Studies</li> <li>Operating systems and reporting to be automated</li> <li>Plan to improve Emissions monitoring</li> </ul>
Flaring/Venting	Improved process/emissions monitoring
Fugitive Emissions	Reviewing methane monitoring systems

Table 3: Triton Emissions reduction initiatives supported by Tailwind

Tailwind is also supportive of the North Sea Transition Deal (NSTD) 2021 that aims to secure the future of the UKCS whilst agreeing to commit to hard targets and dates in lieu of emissions reductions and infrastructure reuse.

In 2021, Tailwind reported the following additional gases:

- NO<sub>X</sub>: 166 (Scope 1) and 360 (Scope 3) tonnes
- SO<sub>X</sub>: 72 (Scope 1) and 6 (Scope 3) tonnes
- Other: 191 (Scope 1) and 175(Scope 3) tonnes (Principally VOC's)

## 6.5 Voluntary Emissions Offsetting

Tailwind fully appreciates that as society transitions towards net zero, the role of voluntary carbon emission offsetting will become increasingly important. We view voluntary offsetting as playing an important, but ultimately secondary role in the overall emission reduction strategy whereby only after all other emission reduction avenues have been explored, will offsetting be used.

Where emissions cannot be reduced or removed any further, we are committed to utilising reputable and recognisable carbon offsetting options with clear and reliable accreditation. We do not view carbon offsetting as a 'quick fix' and will endeavour to reduce emissions via sperate reduction initiatives prior to engaging in the carbon offsetting market.

<sup>&</sup>lt;sup>3</sup> All GHG emissions reductions reported are according to direct emissions.



In 2021, we invested in gaining a deeper understanding of the voluntary carbon offset market and sought to understand and map out appropriate options for the offset of unavoidable emissions. We understand that the voluntary carbon offset market is evolving rapidly, as the demand for reputable credits increases in line with the uptake of climate-related initiatives and targets across all sectors. In light of this, we are exploring novel approaches to market entry, including via equity share participation in early-stage offsetting projects.

#### 6.6 The Task Force on Climate Related Financial Disclosures

Tailwind operates in a rapidly evolving environment and recognises its role as a key player in the energy transition market, supporting the UK Government's drive to Net Zero emissions by 2050. Being a responsible operator and striving to differentiate in elements of environment, social and governance strategy and performance aligns well with Tailwind's wider business strategy. The organisation is committed to ensuring that both its regulatory and wider societal obligations are fulfilled as part of this.

Responsible leadership, management and operation are core elements of Tailwind's business. Tailwind is an active and vocal player in UK oil and gas industry bodies such as Offshore Energies UK (OEUK = formerly Oil and Gas UK - OGUK) and the Association of British Independent Exploration Companies (BRINDEX). In addition, Tailwind supports the UK governments' commitment to oil and gas sector initiatives. Specifically, supporting the UK government's Net Zero emissions target by 2050 through existing and future regulatory compliance and the North Sea Transition Deal supporting a "just" energy transition process for the sector.

Reporting against the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) represents a specific commitment as part of this wider strategy. Developing an approach to the TCFD now, prior to its mandatory implementation in the UK from 2023 and beyond, empowers Tailwind to demonstrate how the structure and function of its business from the Board room to offshore operational locations is committed to transparency and improvement.

This is Tailwind's first TCFD report and has been compiled to reflect how the organisation owns, manages, and reports on its climate related risks and opportunities. In addition, it is envisaged that Tailwind's TCFD report will evolve to demonstrate continuous improvement year on year, both in terms of integrating climate risk and opportunity into wider business strategy but also in demonstration of emissions reduction through asset optimisation, regulatory compliance and carbon offsets.

#### 6.6.1 Governance

The Tailwind Board of Directors has ultimate accountability for the strategy of the organisation and is collectively responsible for the decision making that shapes the growth and development of the organisation. The Tailwind Board comprises four directors and a representative from the principal shareholder, Mercuria. Together this leadership team is responsible for assessing climate related risks and opportunities as part of its wider strategic remit.

#### 6.6.2 Strategy

The Tailwind Board has undertaken a climate risk and opportunities assessment in alignment with and consideration of wider operational and strategic risks faced by the organisation. This assessment considered climate related risks and opportunities that Tailwind could be subject to over the following time horizons as defined by the TCFD:

- Short (0-5 years);
- Medium (5-10 years); and
- Long (10-20 years).

Specific climate related risks opportunities are identified for Tailwind and aligned with the risk categories defined by the TCFD, namely:

- Transitional Risks or Opportunities
  - Policy and Legal;
  - o Technology;
  - o Reputational; and
  - o Market.
- Physical Risks or Opportunities



- o Acute; and
- o Chronic.

Not all TCFD risk categories are currently pertinent to Tailwind's business, but the Board continues to monitor and evaluate both existing and emerging climate related risks and opportunities through assessment of the current business and engagement with the wider industry.

#### 6.6.3 Scenario Analysis

In alignment with the TCFD recommendations, Tailwind has considered potential future climate scenarios and how these different futures may impact key areas of its business in terms of climate risks and opportunities.

Tailwind selected the IEA climate scenarios (The International Energy Agency World Energy Outlook 2021 report<sup>4</sup>) because of the relevance to the oil and gas and wider energy sector. The scenarios were developed by the IEA with a focus on the global energy industry and highlight the challenges that decision makers face to reducing global energy emissions. Being an internationally recognised standard based on reliable, well-informed projections, the IEA scenarios are widely used across many industries, including Tailwind's peers within the UK oil and gas sector.

With 2021 being Tailwind's first TCFD report, the IEA scenarios were chosen to provide strong foundation upon which Tailwind will develop as required to fit its evolving business and wider industry best practices. It is deemed that the IEA scenarios are the most appropriate for Tailwind to reference for its TCFD report and form the basis of Tailwind's TCFD climate risk and opportunity assessment. Tailwind selected the Announced Pledges Scenario and the Sustainable Development Scenario for consideration when undertaking its climate related risk and opportunities assessment.

#### 6.6.4 Climate Risk Management

Once identified and assessed, it is important that Tailwind demonstrates applicable and appropriate management of climate risks and opportunities commensurate with its size and influence. Management processes and activities fall into three main categories which are detailed below:

#### 6.6.4.1 Participation in and influence through industry bodies

Tailwind prides itself in being a vocal champion of ESG and climate performance in OEUK and BRINDEX and understands the long-term value in influencing a sector level approach to the mitigation of climate related risk as well as maximising the opportunities.

#### **6.6.4.2** Management of operated assets

Tailwind has an Environmental, Health and Safety (EHS) Policy which publicly discloses our commitment to environmental accountability and compliance. An Environmental, Health and Safety Management System, Environmental Management Process, Legislative and Regulatory Compliance Process, and dedicated HSE Manager ensures Tailwind can meet their applicable environmental compliance requirements with respect to all aspects of our operations.

Tailwind's EHS Policy and associated Management System is externally assured every 2 years and is compliant with ISO 14001:2015 environmental management standard. The EHS Policy is regularly reviewed by the Board of Directors and signed by the CEO. The Environmental Management Process and Legislative and Regulatory Compliance Process are regularly reviewed and signed by the Chief Operating Officer and the General Counsel respectively.

#### **6.6.4.3** Management of Joint Venture relationships

Tailwind recognises that a significant proportion of its climate related impact is realised though its non-operated host facilities. Many of these are operated by organisations which are significantly larger than Tailwind, however a key focus of Tailwind's participation in these joint ventures revolves around the influence and challenge on climate related topics.

Tailwind is a vocal partner and takes accountability of its non-operated emissions through contribution to an equity share of UK ETS emissions costs. In return Tailwind continually challenges its joint venture partners to demonstrate step change performance in emissions reduction and efficiency of operations.

<sup>&</sup>lt;sup>4</sup> <u>https://www.iea.org/reports/world-energy-outlook-2021</u>



#### 6.6.5 Metrics and Targets

Emissions data is collected from Tailwind's operated and non-operated assets and wider business activities. This data is used to ensure compliance with UKCS regulations and to align with selected ESG benchmarks for disclosure and reporting purposes such as the Global Reporting Initiative (GRI). Specifically, Tailwind measures:

- Emissions data from operated assets;
- Emissions data from non-operated assets / host facilities;
- Energy use from offices; and
- Business travel.

In addition, Tailwind monitors the following metrics to benchmark required performance:

- · Terms and conditions of sustainability linked loans; and
- Emissions and energy intensity for UKCS assets.

## 6.7 The Energy Transition and Net Zero

Tailwind embraces and supports the ongoing transition from a fossil fuel-based economy and society to a more sustainable equivalent, less impactful on the environment and the crisis of climate change. Tailwind is a member of OEUK, the industry trade body for operators, supply chain and all supporting ancillary organisations. We have been part of industry's debate with government since our inception, ensuring that Tailwind is fully abreast of the aspirations of central government through BEIS and OPRED to NSTA as regulator. The Energy White Paper published in December 2020<sup>5</sup> and presented to the UK Parliament culminated in the North Sea Transition Deal where a quid pro quo arrangement was put in place setting out objectives and criteria for the industry (section 6.8).

The White Paper further details the key commitments and expectations of the oil and gas industry in the UK. Tailwind has reviewed these and provides the following summary responses which will help to shape our energy transition strategy and commitments:

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<sup>&</sup>lt;sup>5</sup> Energy White Paper – Powering our Net Zero Future, Dec 2021



North Sea Transition Deal UK Oil and Gas Key Industry Expectations	Tailwind Commitments
Working with the regulators, we will make the UK continental shelf a net zero basin by 2050.	Tailwind commits to a collaborative approach to making the UKCS net zero by 2050.
We will commit the UK to the World Bank's 'Zero Routine Flaring by 2030'.	Tailwind commits to zero flaring in our operations by 2030 unless for emergency or integrity related reasons.
We will support the UK oil and gas sector to repurpose its existing infrastructure in support of clean energy technologies.	Tailwind, if economically viable, will repurpose our infrastructure in support of clean energy.
We will undertake a review of the Offshore Petroleum Regulator for Environment and Decommissioning to drive up environmental standards in its regulatory role and support the sector's progress towards net zero emissions.	Tailwind supports this.
Deliver on wider objectives of the Energy White Paper to support regulator's ability to focus the sector on helping deliver net zero emissions and energy security.	Tailwind, in conjunction with OEUK, has sought engagement with NSTA to ensure compatibility with existing 'Maximising Economic Recovery' strategy.
To ensure that licensing continues to be compatible with our climate change ambitions over the coming decades, we are considering formalising aspects of our existing process.	Tailwind will review as and when any licencing changes are implemented.
We will agree a transformational North Sea Transition Deal with the industry during the first half of 2021.	Tailwind is working with OEUK to deliver a 'Transition Deal' that secures the future of the UKCS whilst agreeing to commit to hard targets and dates in lieu of emissions reductions and infrastructure re-use – see below.
We will use our North Sea Transition Deal to support the UK-based oil and gas supply chain to secure new low-carbon export opportunities in overseas markets.	Not directly applicable to Tailwind.
We will take powers to ensure we maintain a secure and resilient supply of fossil fuels during the transition to net zero emissions.	Not directly applicable to Tailwind.

Table 4: North Sea Transition Deal Commitments

#### 6.8 North Sea Transition Deal

In March 2021, the UK Government agreed a Sector Deal with OEUK – the North Sea Transition Deal 2021 (NSTD)<sup>6</sup>. This deal focusses on the economic opportunities to maximise advantages for the UK oil and gas sector in the global shift to clean growth. The transition deal aims to deliver on the commitments set out in the government's energy white paper to achieve of net zero and provide support for the communities most affected by the move away from oil and gas. The key commitments for the Sector Deal in the White Paper are emissions reduction, delivery of Carbon Capture, Utilisation and Sequestration (CCUS), diversification of existing supply chains, supporting the development of hydrogen production, and safeguarding jobs.

OEUK has worked to ensure the longevity of the UKCS in its current form whilst undertaking measures to allow the successful delivery of the energy transition and meeting the goals of the sector deal. Tailwind has contributed

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<sup>&</sup>lt;sup>6</sup> North Sea Transition Deal, March 2021: https://www.gov.uk/government/publications/north-sea-transition-deal



to these discussions with representation being made for our company, and many like us, who cannot economically commit to some of the objectives as set out. However, Tailwind will continue to monitor and lower carbon intensity (measured as carbon expenditure per unit of production). Tailwind is currently achieving an equity intensity of  $30.94 \text{ kg CO}_2\text{e/bbl}$  across our onshore and offshore operations portfolio in 2021 (compared to  $34.80 \text{ kg CO}_2\text{e/bbl}$  reported in 2020).

The improvement in emissions intensity is in part due to Tailwind M&A activity and the divestment of the Conwy asset in 2021 and we have identified that our future growth strategy will require the assessment of emissions impacts to any changes in our operating portfolio.

We believe we have developed the right responses and actions to comply with the Sector Deal and make it for both industry and the targets of the Energy White Paper. Through continual investment in our assets in mitigating and growing production, our carbon intensity can reduce further.

A summary of the 2021 Sector Deal main actions and Tailwind responses:

Sector Deal Action	Industry Goals	Tailwind Response / Action
Supply Decarbonisation	10% production emissions by 2025	Commitment to achieve NSTD targets in our own operations.
	25% production emissions by 2027	Support to our operators to
	50% production emissions by 2030	achieve NTSD targets.
	(Against a 2018 baseline)	Support to OEUK Pathway to a Net-Zero Basin.
	Sector net-zero by 2050	
	Commit to zero flaring by 2030	
	Commit to OGCI 2025 methane intensity targets	
Carbon Capture & Storage	Invest £2-3bn to build the Transport & Storage Infrastructure to support at two carbon capture clusters by the mid 2020's and two further clusters by 2030	Tailwind has no current plans to participate directly, and future opportunity will depend on M&A activity
Hydrogen	The sector will work with the government to deliver the ambition for 5GW of low carbon hydrogen by 2030	Tailwind has no current plans to participate directly, and future opportunity will depend on M&A activity
Supply chain transformation	Deliver 50% local content on project design, installation, integration and lifecycle operations	Tailwind will ensure our contractors and service providers are meeting these targets
	Provide a UK Energy Supply Chain Leader to champion the sector	
People & Skills	Create 40,000 new jobs which are part of a diverse, high-value energy community	Tailwind has no current plans to participate directly, and future opportunity will depend on M&A activity

Table 5: NSTD 2021 Sector Deal Action Summary



## 7 Social

Tailwind became an active company in 2016 which afforded us the opportunity to 'get it right first time' in our approach to socially responsible operations. The company founders and directors continue to work to ensure all our stakeholders are treated fairly and with respect. Tailwind's policies and undertakings guarantee we interact without discrimination and with equality.

## 7.1 Employee Relations

#### 7.1.1 Employment

Tailwind is an inclusive employer. We are small company that aims to 'employ the best person for the job'. We recognise the positive impact of inclusivity, and the balance that diversity brings, whether in cultural background, ethnicity or gender. This influences our recruitment process, and we strive to ensure Tailwind has a dynamic, skilled and enabled workforce.

Throughout 2021, Tailwind had a staff count of 22, of which 5 were female. The final staff count at the end of the reporting year was 18 due to 6 male staff leaving and 2 new male hires. This has resulted in Tailwind's female staff percentage rising from 23% to 28% in 2021 (compared to the 23% reported in 2020, and the UK ONS 2021 figure of 24% average women in equivalent industry sectors<sup>7</sup>). We are aware that our organisational size is sensitive to any change in individual headcount and we are therefore less concerned with statistics and more with representation and skillsets of the individual and their contribution to the overall organisational culture and dynamic.

We recognise the historical gender imbalance of the UK oil and gas industry and actively seek applications from diverse gender orientation, ethnic backgrounds and different cultures.

Tailwind offers an externally competitive renumeration package made up of salary, annual performance bonus and a Long-Term Incentive Programme. We also grade our staff internally to ensure consistency and fairness across functions and disciplines to neutralise any inherent bias that may occur from a lack of peer comparison in any given role.

The Tailwind leadership work to develop our staff community to ensure we have balance and diversity in our organisation, with opportunities open to all irrespective of age, nationality, gender, ethnicity, sexual orientation or disability.

Tailwind has a flexible approach to work location to help balance home, family or other commitments, with full IT and financial support to allow for remote working. Our proactiveness in this area meant a seamless transition to Covid-working restrictions with no interruption to our business.

#### 7.1.2 Training and Education

Tailwind recognise the importance of continued professional development and encourage all our staff to build on their core competencies while working at Tailwind. Training on company specific policies and processes such as the Code of Conduct and Modern Slavery Statement is provided to all staff and contractors both as part of the company induction and on an ongoing basis.

Tailwind has processes in place to ensure training is provided, and a training and competency matrix is in place which identifies core competencies for key organisational roles.

In 2021, Tailwind supported a total of 466 hours of training for 16 onshore personnel (on average 29.1 hours per employee) and 135 hours of training to ensure the continued competence for 6 offshore personnel (on average 22.5 hours per employee). This compares well with 2020 where we reported 255 and 65 hours for our offshore and onshore personnel respectively.

#### 7.1.3 Diversity and Equal Opportunity (Inclusiveness and a Safe Environment)

Tailwind is committed to our culture of fairness, transparency and inclusiveness, promoting a working environment where challenge and speaking up is encouraged. It is a pre-requisite that all Tailwind employees feel safe and comfortable in their surroundings and environment without any inhibition to express themselves.

 $<sup>^7</sup>$  Office for National Statistics EMP13: Employment by industry  $15^{\rm th}$  February 2022



Tailwind has formalised an Open-Door (whistleblowing) Policy with its personnel to ensure that advice about ethical and lawful behaviour and organisational integrity is readily available from any level of the organisation with complete anonymity. The policy is owned by the Chief Executive Officer and can also be used to communicate concerns of any type to senior management.

We support a healthy work-life balance which, in addition to the above flexible working pattern, includes health insurance coverage that supports and subsidises memberships of sports clubs and provides online advice regarding healthier lifestyle choices.

The sale of Conwy to ENI put the welfare of our transferring staff at the top of our priorities to ensure fair and equal treatment as our staff transitioned over to their new employer.

Our staff turn-over increased in 2021 to 27% principally as a result of the Conwy staff moving with the asset divestment.

Regular feedback sessions – both formal and informal – provide strong evidence that Tailwind is a good place to work.

## 7.2 Health and Safety

Tailwind operates under an integrated Environmental, Health and Safety (EHS) Management System in which all workers fall under which is externally verified to ensure it meets the principles of ISO14001. The system follows the traditional and recognised methodology of Organise, Plan, Do, Assess, Adjust which ensures a universally recognised approach. The EHS Management System covers all of Tailwind's operated assets both onshore and offshore. All Tailwind controlled and accountable workers, activities, and workplaces are covered by the EHS Management System.

Tailwind has a hazard identification, risk assessment, and incident reporting and investigation process as part of its EHS Management System. Every process in the EHS Management System is regularly reviewed for applicability by the HSE Manager and owned by the Chief Operating Officer. This ensures that the processes remain applicable and up to date with regulations, industry best practice and operational changes.

All Tailwind workers regardless of contractual arrangements have the accountability to report incidents to the responsible person identified for a specific Tailwind work site. Following reporting, a process exists for determining the actual and potential severity of the incident, whether it is required to be reported to a regulatory body and which members of the organisation are accountable for the execution and conclusion of the incident investigation process. Root cause analysis is used to determine immediate, intermediate, and underlying causes of the incident if the actual or potential severity of the incident requires this. Corrective actions are implemented as necessary following the implementation of this process.

As an operator, we acknowledge and take the responsibilities that come with that position in our duty to uphold safe operations. We never take for granted the exposure that our operating environment brings to people, the environment and stakeholder expectations. Our HSE record to date is exemplary, but we must never rest on our laurels as we seek to target and deliver zero incidents across our operations. A Major Accident management board which comprises the Directors and Senior Management meet on a regular basis in accordance with the requirements of the corporate major accident prevention policy (CMAPP). The Conwy asset is a not permanently attended installation (NPAI) that is remotely operated, on a day-to-day basis, from ENI's Douglas platform. However, physical visits to Conwy are required to ensure maintenance, process reliability and that safety and environmental critical elements (SECE) are in good order. Our record on all HSE performance on Conwy was exemplary with no Lost Time Incidents reported since Tailwind became the operator. We believe our HSE culture, diligence, experienced staff and financial commitment has ensured this record.

The Tailwind CEO presents monthly HSE and Business updates to all personnel to ensure collaboration and worker management engagement throughout the business.

On our non-operated assets, health and safety management is the accountability of the respective operators. However, Tailwind can influence decision making and performance through our presence in joint ventures operating committee meetings. We have the right of assurance and audit and can raise concerns about performance directly with the operators.



The primary health and safety lagging indicators used by Tailwind are:

- Lost Time Incident (LTI)
- Restricted Work Cases (RWC)
- Medical Treatment Cases (MTC)
- First Aid Cases (FAC)

Tailwind recorded zero incidents relating to any of the definitions above in 2021 from an offshore exposure of 2259 hours worked. While it is recognised that Tailwind has a significantly smaller workforce and associated offshore exposure compared to many of its peers, this still represents a significant achievement and is well below the industry average for all incident class definitions.

#### 7.3 Indirect Economic Benefit

Tailwind has demonstrably grown our business since inception in 2016 as a start-up. In the intervening period, we have acquired 3 asset clusters with a legacy reserves pool of 20 million BOE. Through investment and cash recycle to date in excess of \$200mm, we have reinstated offline wells, drilled new wells and successfully brought a field re-development online as well as preparing for a new development to come onstream in 2022.

The combination of these activities has resulted in Tailwind now holding an independently verified (2P) reserves base in excess of 60mmboe. The economic activity generated through our investments has seen a flow through into supporting a diverse supply chain, specialist consultants and global service providers.

The additional benefit to our partners, through our investments, would simply not have happened without Tailwind's intervention and execution. We are demonstrably aligned with the Regulator's 'Maximising Economic Recovery' strategy supporting the UKCS and the broader economy.

## 7.4 Community Engagement and Charitable Giving

Tailwind is conscious of giving back and supporting good causes. We have deliberately chosen to support the energy transition through major sponsorship of Durham University Electric Motorsport (DUEM). DUEM is a non-profit organisation run entirely by students in the development and advancement for solar powered transport.

Tailwind believes that we are both supporting the understanding and application of solar power but also helping develop the next generation of engineers and entrepreneurs. DUEM is also learning about the energy transition from the hydrocarbon economy and building appreciation of the need for collaboration between stakeholders involved in fossil-fuel and renewable energy sources. With our support, DUEM hopes to compete with their fully in-house developed car in the World Solar Power series against much more fully funded organisations. Our contribution to DUEM is £50,000 over 2 years with the ability to renew our support at the end of that period.

In 2021 the DUEM team won the Bright Network Environmental Society of the Year Award. This is awarded to a UK-based society that has done its best to raise awareness for environmental issues at its university and taken steps to improve sustainability within the student population. The DUEM team have achieved this through its multitude of community outreach events and school visits. We are immensely proud of the DUEM team receiving this award, beating every competitor society in the UK. Tailwind continues to have an active role in supporting the DUEM team and looks forward to receiving regular updates on the progress of their innovative solar powered car.



# 8 Governance

Tailwind is committed to being transparent, ethical, and a good corporate citizen. We aim to help meet the UK's energy needs in a way that manages the health and safety of people, limits environmental impact, supports the energy transition, supports our communities, and delivers long term value for stakeholders.

Our Code of Conduct, and EHS Policy support our expectations for ESG performance and management.

Tailwind also adheres to and abides by the Wates Principles<sup>8</sup> to demonstrate good practice and achieve value for our investors, employees and wider society. The six principles include purpose and leadership, Board composition, Director responsibilities, opportunity and risk management, fair and considerate remuneration and stakeholder engagement.

#### 8.1 Code of Conduct

Tailwind's Code of Conduct is a key part of our culture and how we work. All employees, directors, contractors, and those working on our behalf are expected to abide by all applicable laws and our Code. The Code sets out the key expectation of upholding ethical business practices, including:

- Anti-bribery and Corruption;
- Gifts and Hospitality;
- Conflicts of Interest;
- Donations and Sponsorship;
- Interacting with Public Officials;
- Modern Slavery and Human Trafficking; and
- Fraud Prevention.

Tailwind encourages employees, contractors and third parties to ask questions, voice concerns, and report any alleged violations of the Code of Conduct or any other company policies.

Employees and relevant contractors receive in-person training on the Code of Conduct and company policies when joining Tailwind, and refresher training is provided annually. There have been no reported or confirmed incidents of corruption during the year. There are no legal actions taken or pending against Tailwind relating to anti-competitive behaviour or violations of anti-trust and monopoly legislation during the year.

## 8.2 Supply Chain

Tailwind values our supply chain and business relationships and recognise that they are an important aspect of our success. Our business relationships include customers, suppliers, vendors, joint venture partners and other third-party contractors. All interactions with our business partners must be ethical and conducted with honesty and integrity.

We treat our suppliers of goods and services equitably and engage fair supplier selection. This means all Tailwind personnel must:

- Comply with applicable company and regulatory sourcing or purchasing policies and guidelines;
- Select suppliers objectively and in accordance with applicable company and regulatory bidding and supplier selection guidelines, including environmental, health and safety practices; and
- Communicate to our suppliers that we expect them to uphold the principles of integrity, honesty, and
  ethical business conduct; support our commitment to safety; and behave in a manner that reflects the
  principles in our Code.

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<sup>&</sup>lt;sup>8</sup> The Wates Corporate Governance Principles for Large Private Companies, December 2018, FRC-Financial Reporting Council



## 8.3 Management Accountability

The highest level of management at Tailwind is the Board of Directors. The Board is collectively responsible for the decisions made towards the long-term success of Tailwind and how the strategic, operational and risk management decisions have been implemented throughout our business. As per our adoption of the Wates Principles, the Board has a formal set of principles to adhere to and be guided by.

The Board is actively engaged in developing and reviewing Tailwind's ESG performance and works alongside our Leadership team to evaluate risks and further opportunities. The Tailwind Group Board is comprised of four Tailwind directors and a representative from our principal shareholder, Mercuria. This balance ensures that there is an inherent ability for challenge on compliance, both financially and regulatory.

Tailwind's HSE Manager and Legal and Business Services Manager assists the Leadership team to monitor the performance and key risks that Tailwind faces in relation to environmental, social and governance matters. Leadership is accountable to:

- Oversee the company's conduct and ESG performance;
- Take accountability for the ownership of Tailwind's climate-related risks and opportunities;
- Make recommendations on where action on ESG topics may be needed;
- Review and monitor ESG policies and the effectiveness of compliance;
- Consider ESG issues, risks, strategies and responses to climate change issues; and
- Review Group management's proposals on ESG targets and goals.

Leadership guided the company's response to the COVID-19 pandemic through a series of actions that helped protect our employees and the communities in which we work. To learn more about our COVID-19 response, please see our Annual Report.

Tailwind continues to evolve and advance our management systems in a manner that aligns with Tailwind's portfolio and development ambitions. As part of this, Tailwind completes ongoing assurance and continuous improvement through risk management, audits and assessments of our management systems and compliance requirements. A full description of our governance compliance with Section 172 Statement Companies Act 2006 can be found in our Annual Report and Accounts.



# 9 Statement by ITPEnergised

ITPEnergised is a world-leading net-zero focused consultancy offering energy, environmental, engineering, technical advisory and renewables asset management services. From strategic advisory and project preparation to technical services during feasibility, design, construction, repurposing and decommissioning, ITPEnergised's global coverage, international specialists and 'trusted advisor' approach have earned us an outstanding reputation with clients across sectors, technologies and geographies.

ITPEnergised have worked with Tailwind since 2020 to support the development of ESG strategy initiatives, emissions quantification and ESG disclosures. The work undertaken for Tailwind by ITPEnergised provides an unbiased, independent check and balance and ensures that Tailwind's ESG information is reported in line with industry good practice and aligns recognised international reporting standards.



# 10 GHG Verification Statement by ERCE



## STATEMENT OF GHG EMISSIONS VERIFICATION 27 April 2022

#### Scope

ERC Evolution ("ERCE") was appointed by Tailwind Energy ("Tailwind") to conduct a review of Tailwind's Greenhouse Gas ("GHG") Statement for the period 1st January 2021 to 31st December 2021.

Tailwind's management was responsible for preparing the GHG Inventory, and for maintaining effective internal controls over the data and information disclosed. ERCE's responsibility was to carry out an assurance engagement on the GHG inventory in accordance with our contract with Tailwind. Ultimately, the GHG inventory has been approved by, and remains the responsibility of Tailwind.

#### Methodology

ERCE conducted its review to a limited level of assurance, in accordance with the procedures recommended in GHG Protocol entitled "The GHG Protocol: A corporate reporting and accounting standard" (Revised edition, 30 Mar 2004) and the principles of ISO 14064-3:2019, entitled "Part 3: Specification with guidance for the verification and validation of greenhouse gas statement".

#### Conclusion

As detailed in our report entitled "P5517-CA-003-R1-GHG Verification Report" dated 27 April 2022, ERCE has not found any material discrepancies in the GHG inventory provided by Tailwind within the scope of limited assurance.

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Rouha Hussaina Head of Energy Transition Services ERC Evolution Ltd.

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# **Appendix 1 - Tailwind 2021 ESG Databook**



## **2021 Tailwind ESG Databook**

GRI	SASB	Data Requirement	Units	2021
Emissions				
305-1	EM-EP-110a.1	Gross direct (Scope 1) GHG emissions	Tonnes CO₂e	34,912
	EM-EP-110a.1	Percentage of scope 1 emissions consisting of methane	%	2.99
	EM-EP-110a.1	Percentage of scope 1 emissions covered by UK ETS	%	0
	EM-EP-110a.1	Total CH4 emissions from flaring and fuel consumption	Tonnes	Scope 1 = 35.78 Scope 2 = 0 Scope 3 = 104.58
	EM-EP-110a.2	Amount of scope 1 emissions from flared hydrocarbons	Tonnes CO₂e	4,564.40
	EM-EP-110a.2	Amount of scope 1 emissions from other combustion	Tonnes CO₂e	29,695.72
	EM-EP-110a.2	Amount of scope 1 emissions from process emissions	Tonnes CO₂e	0.00
	EM-EP-110a.2	Amount of scope 1 emissions from other vented	Tonnes CO2e	170.61
	EM-EP-110a.2	Amount of scope 1 emissions from fugitive emissions	Tonnes CO₂e	470.25
305-2		Gross location-based energy indirect (Scope 2) GHG emissions	Tonnes CO₂e	24.65
305-2		Gross market-based energy indirect (Scope 2) GHG emissions	Tonnes CO₂e	10.29
305-3		Gross other indirect (Scope 3) GHG emissions	Tonnes CO₂e	133,261
305-4		GHG emissions intensity	Kg CO₂e/boe	Average Production intensity = 26.89 (22.66 exc. Conwy) Average Overall Emissions Intensity = 30.94 (34.8 in 2020)
305-5		GHG emissions reduced as a direct result of reduction initiatives	Tonnes CO₂e	c. 34,912

Tailwind Energy ESG Report 2021



GRI	SASB	Data Requirement	Units	2021
305-7	EM-EP-110a.1	Total NO <sub>x</sub> emissions from combustion activities	Tonnes	Scope 1 = 165.66 Scope 2 = 0 Scope 3 = 359.98
305-7	EM-EP-110a.1	Total SO <sub>x</sub> emissions from combustion activities	Tonnes	Scope 1 = 71.54 Scope 2 = 0 Scope 3 = 6.30
305-7	EM-EP-110a.1	Significant air emissions, in kilograms or multiples, for each of the following: iii. Persistent organic pollutants (POP) iv. Volatile organic compounds (VOC) v. Hazardous air pollutants (HAP) vi. Particulate matter (PM) vii. Other standard categories of air emissions identified in relevant regulations	Tonnes	Scope 1 =191.21 Scope 2= 0 Scope 3 = 175.09
	EM-EP-110a.2	Tonnes of flared gas	Tonnes	Scope 1 =1574.67 Scope 2 = 0 Scope 3 = 7352.22
	EM-EP-420a.1	Sensitivity of hydrocarbon reserve levels to future price projection scenarios that account for a price on carbon emissions	bbl	0
	EM-EP-420a.2	Estimated carbon dioxide emissions embedded in proved hydrocarbon reserves	Tonnes	Not available
	ntified as material to Tailwind	Tonnes of gas vented	Tonnes	Scope 1 = 248.96 Scope 2= 0 Scope 3 = 652.215
	ntified as material to Tailwind	Tonnes of fuel used	Tonnes	Scope 1 = 11,249.13 Scope 2= 0 Scope 3 = 52,996.769



GRI	SASB	Data Requirement	Units	2021
Waste				
306-3		Total weight of waste generated in metric tons, and a breakdown of this total by composition of the waste.	Tonnes	1.190 (Conwy)
306-4		a. Total weight of waste diverted from disposal in metric tons, and a breakdown of this total by composition of the waste.  b. Total weight of hazardous waste diverted from disposal in metric tons, and a breakdown of this total by the following recovery operations:  i. Preparation for reuse;  ii. Recycling;  iii. Other recovery operations.  c. Total weight of non-hazardous waste diverted from disposal in metric tons, and a breakdown of this total by the following recovery operations:  i. Preparation for reuse;  ii. Recycling;  iii. Other recovery operations.  d. For each recovery operation listed in Disclosures 306-4-b and 306-4-c, a breakdown of the total weight in metric tons of hazardous waste and of non-hazardous waste diverted from disposal:  i. onsite;  ii. offsite.	Tonnes	0.64 (Segregated Recyclables



GRI	SASB	Data Requirement	Units	2021
306-5		a. Total weight of waste directed to disposal in metric tons, and a breakdown of this total by composition of the waste. b. Total weight of hazardous waste directed to disposal in metric tons, and a breakdown of this total by the following disposal operations: i. Incineration (with energy recovery); iii. Incineration (without energy recovery); iii. Landfilling; iv. Other disposal operations. c. Total weight of non-hazardous waste directed to disposal in metric tons, and a breakdown of this total by the following disposal operations: i. Incineration (with energy recovery); iii. Incineration (without energy recovery); iii. Landfilling; iv. Other disposal operations. d. For each disposal operation listed in Disclosures 306-5-b and 306-5-c, a breakdown of the total weight in metric tons of hazardous waste and of non-hazardous waste directed to disposal: i. onsite; ii. offsite.	Tonnes	0.45 (Chemicals/Paint) 0.1 (Special Waste)
	tified as material to Tailwind	Number and volume of significant spills		0
Production				
102-7	EM-EP-000.A	Oil production	mmbbl	4.94
102-7	EM-EP-000.A	Gas production	bscf	2.83



GRI	SASB	Data Requirement	Units	2021
Energy				
302-1		Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used	GJ	708,125
302-1		Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used	GJ	219
302-1		In joules, watt-hours or multiples, the total: i. electricity consumption ii. heating consumption iii. cooling consumption iv. steam consumption	MWh	106.67
302-1		Total energy consumption within the organization, in joules or multiples	MWh	51,892
302-2		Energy consumption outside of the organization, in joules or multiples	MWh	144,871
302-3		Energy intensity	MWh/toe	0.27
	EM-EP-420a.3	Amount invested in renewable energy, revenue generated by renewable energy sales	GBP	0
Water and	effluents			
301-1		Total weight or volume of materials that are used to produce and package the organization's primary products and services during the reporting period, by non-renewable materials and renewable materials	kg	930 kg
	EM-EP-140a.1	(1) Total fresh water withdrawn, (2) total fresh water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress		n/a
	EM-EP-140a.2	Volume of oil in water reinjected	Tonnes	0
	EM-EP-140a.2	Average concentration of oil produced reinjected	mg/l	n/a
	EM-EP-140a.2	Volume of produced water and flowback generated; percentage (1) discharged, (2) injected, (3) recycled; hydrocarbon content in discharged water	m3	n/a



GRI	SASB	Data Requirement	Units	2021
	EM-EP-140a.3	Percentage of hydraulically fractured wells for which there is public disclosure of all fracturing fluid chemicals used  **P-140a.3**  Percentage of hydraulically fractured wells for which there is public disclosure of all fracturing fluid chemicals used		n/a
	EM-EP-140a.4	Percentage of hydraulic fracturing sites where ground or surface water quality deteriorated compared to a baseline	%	n/a
	EM-EP-160a.2	Number and aggregate volume of hydrocarbon spills, volume in Arctic, volume impacting shorelines with ESI rankings 8-10, and volume recovered	Number	n/a
Health and	Safety			
403-8		Number of workers who are covered by an occupational health and safety management system	Number	22/18
403-8		Percentage of workers who are covered by an occupational health and safety management system	%	100
403-9		<ul> <li>a. For all employees:</li> <li>i. The number and rate of fatalities as a result of work-related injury;</li> <li>ii. The number and rate of high-consequence work-related injuries (excluding fatalities);</li> <li>iii. The number and rate of recordable work-related injuries;</li> <li>iv. The main types of work-related injury;</li> <li>v. The number of hours worked.</li> <li>b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:</li> <li>i. The number and rate of fatalities as a result of work-related injury;</li> <li>ii. The number and rate of high-consequence work-related injuries (excluding fatalities);</li> <li>iii. The number and rate of recordable work-related injuries;</li> <li>iv. The main types of work-related injury;</li> <li>v. The number of hours worked.</li> </ul>		a and b i. 0 ii. 0 iii. 0 iv. n/a v. 2,259 (Conwy) office normal hrs c. 33,000 hrs but n/a in 2021 due to COVID and homeworking)
403-10		<ul> <li>a. For all employees:</li> <li>i. The number of fatalities as a result of work-related ill health;</li> <li>ii. The number of cases of recordable work-related ill health;</li> <li>iii. The main types of work-related ill health.</li> <li>b. For all workers who are not employees but whose work and/or workplace is controlled by</li> </ul>		a and b i. 0 ii. 0 iii. n/a



GRI	SASB	Data Requirement	Units	2021
		the organization: i. The number of fatalities as a result of work-related ill health; ii. The number of cases of recordable work-related ill health; iii. The main types of work-related ill health.		
	EM-EP-320a.1 Total recordable incident rate (TRIR) Number		0	
	EM-EP-320a.1	Near Miss Frequency Rate (NMFR)	NMFR per 200,000 manhours	0
	EM-EP-320a.2	Near Miss Frequency Rate (NMFR)	NMFR per 1,000,000 manhours	0
	EM-EP-320a.3	Fatality rate	Number	0
	EM-EP-540a.1	Process Safety Event (PSE) rates for Loss of Primary Containment (LOPC) of greater consequence (Tier 1)	Number	0
Diversity an	d Inclusion			
102-8		Number of male employees	Number	17/13
102-8		Number of female employees	Number	5 and 5
102-8		Proportion of female employees	%	23/28
102-8		Number of full-time employees	Number	22/18
102-8		Number of part-time employees	Number	0
404-1		Average hours of training during the year for offshore employees	Hours	22.5 (135/6)
404-1		Average hours of training during the year for onshore employees	Hours	29.5 (466/16)
405-1		Male employees	%	77/72
405-1		Female employees	%	23/28
405-1		Employees aged under 30 years old	%	2 and 1



GRI	SASB	Data Requirement	Units	2021
405-1		Employees aged between 30-50 years old	%	10 and 8
405-1		Employees aged over 50 years old	%	10 and 9
412-2		Total number of hours in the reporting period devoted to training on human rights policies or procedures concerning aspects of human rights that are relevant to operations.	Hours	1 hour per employee
412-2		Percentage of employees trained during the reporting period in human rights policies or procedures concerning aspects of human rights that are relevant to operations.	%	100%
413-1		Percentage of operations with implemented local community engagement, impact assessments, and/or development programs	%	0
Employee T	urnover			
401-1		Total new hires	Number	2
401-1		Male new hires	Number	2
401-1		Female new hires	Number	0
401-1		New hires aged under 30 years old	Number	0
401-1		New hires aged between 30-50 years old	Number	0
401-1		New hires aged over 50 years old	Number	2
401-1		Total number of employees who left the company	Number	6
401-1		Total number of employees who left the company	%	27
401-1		Male employees leaving	Number	6
401-1		Female employees leaving	Number	0
401-1		Employees leaving aged under 30 years old	Number	1
401-1		Employees leaving aged between 30-50 years old	Number	2
401-1		Employees leaving aged over 50 years old	Number	3



GRI	SASB	Data Requirement	Units	2021
401-3	a. Total number of employees that were entitled to parental leave, by gender. b. Total number of employees that took parental leave, by gender. c. Total number of employees that returned to work in the reporting period after parental leave ended, by gender. d. Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work, by gender. e. Return to work and retention rates of employees that took parental leave, by gender.		a. all staff; b. 0; c. 0; d. 1; e. 100%	
Freedom of	f Association			
102-41		Percentage of total employees covered by collective bargaining agreements	%	0
Supply Chai	in			
204-1		Percentage spend on UK suppliers	%	99
308-1		Percentage of new suppliers that were screened using environmental criteria	%	0
Board Com	position			
405-1		Male governance body individuals	%	4
405-1		Female governance body individuals	%	0
405-1		Governance body members aged under 30 years old	%	0
405-1		Governance body members aged between 30-50 years old	%	1
405-1		Governance body members aged over 50 years old	%	3
Biodiversity	у			
304-4		Total number of IUCN Red List species and national conservation list species with habitats in areas affected by the operations of the organization, by level of extinction risk:  i. Critically endangered  ii. Endangered  iii. Vulnerable	1 Endangered	Basking Shark (Conwy)



GRI	SASB	Data Requirement	Units	2021
		iv. Near threatened v. Least concern		
Metric ide	ntified as material to Tailwind	Number of spills posing a biodiversity impact	Number	0
Ethics and	Regulations			
205-2		Total number of governance body members that have received training on anti-corruption	Number	4
205-2		Percentage of governance body members that have received training on anti-corruption	%	100
205-2		Total number of employees that have received training on anti-corruption, broken down by employee category	Number	18
205-2		Percentage of employees that have received training on anti-corruption, broken down by employee category	%	100
205-2		Number of refresher courses for ABC training	Number	1 annually
205-3		Total number of confirmed incidents of corruption	Number	0
205-3		Total number of confirmed incidents in which employees were dismissed or disciplined for corruption	Number	0
205-3		Total number of confirmed incidents when contracts with business partners were terminated	Number	0
205-3		Total number of public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases	Number	0
206-1		Number of legal actions pending or completed during the reporting period regarding anti- competitive behaviour and violations of anti-trust and monopoly legislation in which the organization has been identified as a participant.	Number	0
307-1		Significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations in terms of: i. total monetary value of significant fines; ii. total number of non-monetary sanctions; iii. cases brought through dispute resolution mechanisms	Number	0



GRI	SASB	Data Requirement	Units	2021
416-2		Total number of incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services within the reporting period, by:  i. incidents of non-compliance with regulations resulting in a fine or penalty;  ii. incidents of non-compliance with regulations resulting in a warning;  iii. incidents of non-compliance with voluntary codes.	Number	0
	EM-EP-210a.1	Percentage of (1) proved and (2) probable reserves in or near areas of conflict	%	0
	EM-EP-510a.1	Percentage of (1) proved and (2) probable reserves in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	%	0
General Disclosures				
102-7		Total number of employees	Number	22/18
102-7		Total number of operations	Number	4
	EM-EP-000.B	Number of offshore sites	Number	1
	EM-EP-000.C	Number of terrestrial sites	Number	2
Economic C	ontribution			
102-7		Net Sales	GBP	277,467.66
102-7		Total capitalization broken down in terms of debt and equity	GBP	255,076.58 (Debt) 301,879.11 (Equity)
201-1		Direct economic value generated (revenues)	GBP	277,467.66
201-1		Economic value distributed (operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments)	GBP	cost of sales= (192,180.55) Finance Costs = (7,207.44) Administrative costs = (15,664.34)



GRI	SASB	Data Requirement	Units	2021
201-1		Economic value retained (direct economic value generated less economic value distributed)	GBP	£62,415,000
	tified as material to Tailwind	Number of Board Members with climate related accountability	Number	4
Metric identified as material to Tailwind		Percentage contribution to UK energy market - Operated and non-operated assets	%	0.6%
Metric identified as material to Tailwind		Total contribution to UK energy market - Operated and non-operated assets	MWh	9,223,603



## Appendix 2 - Tailwind 2021 GRI Disclosure



## **2021 Tailwind GRI Content Index: Core Option**

GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission					
GRI 101: Founda	tion 2016							
General Disclosures	General Disclosures							
	Organizational profile							
	102-1 Name of the organization	Tailwind Energy Ltd	No Omission					
	102-2 Activities, brands, products, and services	The winning, exploitation and production of oil and gas on the UK Continental Shelf.	No Omission					
	102-3 Location of headquarters	London, United Kingdom	No Omission					
	102-4 Location of operations	Tailwind's operations are based in the UK. Oil and gas infrastructure is offshore on the UK Continental Shelf. https://www.tailwind.co.uk/OPERATIONS	No Omission					
GRI 102: General Disclosures 2016	102-5 Ownership and legal form	Tailwind is a Private Limited Company, registered in the UK and comprising of: - Tailwind Energy Ltd parent - Tailwind Mistral Ltd subsidiary	No Omission					
	102-6 Markets served	Tailwind provides oil and gas to the UK, European and North American Energy Markets.	No Omission					
	102-7 Scale of the organization	As of January 2022, Tailwind has 18 employees – additional data relating to the economic scale of the organisation is provided in the Tailwind Energy Annual Report and Financial Statements available from: https://www.tailwind.co.uk/news. Further information can be found in the Databook disclosure 102-7.	No Omission					
	102-8 Information on employees and other workers	Tailwind has 18 employees and 17 contractors all working in the UK. Out of the total compliment of 39, one is part-time. Tailwind's staff compliment comprises of 13 male and 5 female personnel.	No Omission					



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	102-9 Supply chain	Tailwind works with a number of established integrated and specialist companies which provide:  - Oil and gas production services  - Oil and gas production products  - Safety services  - Transportation and logistics	No Omission
	102-10 Significant changes to the organization and its supply chain	Tailwind divested from Conwy and acquired interests in Orlando in June 2021.	No Omission
	102-11 Precautionary Principle or approach	All of Tailwind's operations are based in the UK and comply with UK legislation, specifically the Energy Act, Petroleum Act, Environment Protection Act, The Offshore Installations (Offshore Safety Directive) (Safety Case etc) Regulations 2015 which ensures that the Precautionary Principle is applied to all activities.	No Omission
	102-12 External initiatives	Tailwind recognise and align with the GRI Core Option as well as aligning our EHS Management System with the principles of ISO14001: 2015 as per the requirements of The Convention for the Protection of the Marine Environment of the North-East Atlantic (OSPAR Convention). Tailwind is actively developing a strategy to meet the recommendations of the TCFD. For the first time Tailwind has aligned ESG reporting with the SASB disclosure framework. This is described in more detail in section 3.6 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
	102-13 Membership of associations	Tailwind is a member of Oil and Gas UK (OGUK) and The Association of British Independent Exploration Companies (Brindex).	No Omission
	Strategy		
	102-14 Statement from senior decision-maker	A statement from the senior decision-maker is provided in the CEO's Introduction to 2021 ESG Report in section 3.3 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission	
	Ethics and integrity			
	102-16 Values, principles, standards, and norms of behaviour	Values, principles, standards and norms of behaviour are managed and owned by the Board of Directors and implemented in the organisation by the Chief Operating Officer.  This is described in the Environment, Social and Governance sections of Tailwind Energy's Annual Report and Financial Statements 2020. A summary is provided on the Tailwind website here: https://www.tailwind.co.uk/GOVERNANCE.	No Omission	
	102-17 Mechanisms for advice and concerns about ethics	Tailwind's whistle-blowing policy is described in detail in section 7.1.3 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission	
	Governance			
	102-18 Governance structure	A description of our Governance Structure is provided in the Environmental, Social and Governance section of the 2020 Tailwind Energy Annual Report and Financial Statements available on Tailwind's website.	No Omission	
	Stakeholder engagement	Stakeholder engagement		
	102-40 List of stakeholder groups	A description of Tailwind's primary stakeholders can be found in sections 3.4 and 3.6 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission	
	102-41 Collective bargaining agreements	There are currently no collective bargaining agreements in place for Tailwind's workforce.	No Omission	
	102-42 Identifying and selecting stakeholders	A description of Tailwind's stakeholder mapping process can be found in section 4.2 and 4.3 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission	
	102-43 Approach to stakeholder engagement	A description of Tailwind's approach to stakeholder engagement can be found in section 3.4 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission	
	102-44 Key topics and concerns raised	A description of Tailwind's stakeholder concerns can be found in section 3.6 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission	



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	Reporting practice		
	102-45 Entities included in the consolidated financial statements	The entities included are described in the 2020 Tailwind Energy Annual Report and Financial Statements, available here: https://www.tailwind.co.uk/Tailwind-continues-with-a-strong-2020-performance-2020-annual.	No Omission
	102-46 Defining report content and topic Boundaries	This is described in Section 4-Materiality of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
	102-47 List of material topics	This is described in Section 4-Materiality of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
	102-48 Restatements of information	There has been 1 restatement of Tailwind's 2020 ESG Report: Due to a calculation error, emissions associated with purchased grid electricity were reported as $9,230 \text{ tCO}_2\text{e}$ but were actually $9,230 \text{ kgCO}_2\text{e}$ . This has not had any material effect on Tailwind's overall emissions and has been corrected in the 2021 Tailwind ESG Report.	No Omission
	102-49 Changes in reporting	Disclosure 302-2 is deemed material to Tailwind for the 2021 and is the only change in the reporting of material topics from the 2020 disclosure.	No Omission
	102-50 Reporting period	01 January 2021 to 31 December 2021.	No Omission
	102-51 Date of most recent report	April 2022.	No Omission
	102-52 Reporting cycle	Annual	No Omission
	102-53 Contact point for questions regarding the report	Mr Stephen Edwards – CEO, Tailwind Energy Ltd	No Omission
	102-54 Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option	No Omission
	102-55 GRI content index	The GRI Content Index is available on Tailwind's website, available here: https://www.tailwind.co.uk/RESPONSIBILITY	No Omission



## **Material Topics**

GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
200 series (Econo	omic topics)		
<b>Economic Performance</b>			
	103-1 Explanation of the material topic and its Boundary	Tailwind is a value driven oil and gas company focused on the acquisition, exploration, development and production of oil and gas reserves on the UK Continental Shelf (UKCS). Our assets during the reporting period include Triton, Columbus, Orlando and Conwy (divested in June 2021). Economic performance of Tailwind's assets is material for the company, its employees, its shareholders and stakeholders.	No Omission
GRI 103: Management Approach 2016	103-2 The management approach and its components	This is in part presented in the 'Leadership Team' section of Tailwind's website available from: https://www.tailwind.co.uk/leadership-team. In addition, Tailwind has policies, commitments, goals and targets, responsibilities, resources, grievance mechanisms and other specific actions in place to address material topics as outlined throughout the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
	103-3 Evaluation of the management approach	Tailwind's leadership team regularly evaluates the efficacy of their management approach and makes adjustments as needed.	No Omission
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Tailwind is a private company with operations in the UK. Tailwind produces an Annual Report and Financial Statements which include reference to revenues, economic value distributed, and economic value retained, available here: https://www.tailwind.co.uk/news. Further information can be found in the Databook in the 2021 ESG report available on Tailwind's website.	No Omission
	201-2 Financial implications and other risks and opportunities due to climate change	A description of Tailwind's climate related financial impacts, risks and opportunities can be found in section 6.6 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission	
	201-3 Defined benefit plan obligations and other retirement plans	Do not report - Not material	Not Applicable	
	201-4 Financial assistance received from government	Do not report - Not material	Not Applicable	
Market Presence				
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable	
GRI 103: Management Approach 2016	103-2 The management approach and its components	Do not report - Not material	Not Applicable	
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable	
GRI 202: Market	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Do not report - Not material	Not Applicable	
Presence 2016	202-2 Proportion of senior management hired from the local community	Do not report - Not material	Not Applicable	
Indirect Economic Impa	Indirect Economic Impacts			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Tailwind is a value driven oil and gas company focused on the acquisition, exploration, development and production of oil and gas reserves on the UK Continental Shelf (UKCS). Our assets during the reporting period include Triton, Columbus, Orlando and Conwy (divested in June 2021). Economic performance of Tailwind's assets is material for the company, its employees, its shareholders and stakeholders.	No Omission	



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	103-2 The management approach and its components	This is in part presented in the 'Leadership Team' section of Tailwind's website available from: https://www.tailwind.co.uk/leadership-team. In addition, Tailwind has policies, commitments, goals and targets, responsibilities, resources, grievance mechanisms and other specific actions in place to address material topics as outlined throughout the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
	103-3 Evaluation of the management approach	Tailwind's leadership team regularly evaluates the efficacy of their management approach and makes adjustments as needed. Further indication as to the formal and informal mechanisms in place to evaluate Tailwind's leadership approach is available for perusal as requested.	No Omission
GRI 203: Indirect	203-1 Infrastructure investments and services supported	A description of Tailwind's significant indirect economic impacts can be found in section 7.3 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
Economic Impacts 2016	203-2 Significant indirect economic impacts	A description of Tailwind's significant indirect economic impacts can be found in section 7.3 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
<b>Procurement Practices</b>			
	103-1 Explanation of the material topic and its Boundary	Tailwind is a value driven oil and gas company focused on the acquisition, exploration, development and production of oil and gas reserves on the UK Continental Shelf (UKCS). Our assets during the reporting period include Triton, Columbus, Orlando and Conwy (divested in June 2021). Economic performance of Tailwind's assets is material for the company, its employees, its shareholders and stakeholders.	No Omission
GRI 103: Management Approach 2016	103-2 The management approach and its components	This is in part presented in the 'Leadership Team' section of Tailwind's website available from: https://www.tailwind.co.uk/leadership-team.	No Omission
	103-3 Evaluation of the management approach	Tailwind's leadership team regularly evaluates the efficacy of their management approach and makes adjustments as needed. Further indication as to the formal and informal mechanisms in place to evaluate Tailwind's leadership approach is available for perusal as requested.	No Omission



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission	
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Tailwind is a UK company, and the majority of our spending (99%) is within the UK and with UK suppliers.	No Omission	
Anti-corruption				
GRI 103: Management	103-1 Explanation of the material topic and its Boundary	Tailwind is a value driven oil and gas company focused on the acquisition, exploration, development and production of oil and gas reserves on the UK Continental Shelf (UKCS). Our assets during the reporting period include Triton, Columbus, Orlando and Conwy (divested in June 2021). Economic performance of Tailwind's assets is material for the company, its employees, its shareholders and stakeholders.	No Omission	
Approach 2016	103-2 The management approach and its components	This is in part presented in the 'Leadership Team' section of Tailwind's website available from: https://www.tailwind.co.uk/leadership-team.	No Omission	
	103-3 Evaluation of the management approach	Tailwind's leadership team regularly evaluates the efficacy of their management approach and makes adjustments as needed. Further indication as to the formal and informal mechanisms in place to evaluate Tailwind's leadership approach is available for perusal as requested.	No Omission	
	205-1 Operations assessed for risks related to corruption	A description of Tailwind's anti-corruption policies and procedures can be found in section 8.1 of the 2021 Tailwind ESG Report available on Tailwind's website	No Omission	
GRI 205: Anti- corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	A description of Tailwind's communication and training on anti-corruption policies and procedures can be found in section 8.1 and in the Databook for disclosure 205-2.	No Omission	
	205-3 Confirmed incidents of corruption and actions taken	There have been no reported or confirmed instances of corruption at Tailwind in 2021.	No Omission	
Anti-competitive Behaviour				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Tailwind is a value driven oil and gas company focused on the acquisition, exploration, development and production of oil and gas reserves on the UK Continental Shelf (UKCS). Our assets include Triton, Conwy and Columbus. Economic performance of Tailwind's assets is material for the company, its employees, its shareholders and stakeholders.	No Omission	



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	103-2 The management approach and its components	This is in part presented in the 'Leadership Team' section of Tailwind's website available from: https://www.tailwind.co.uk/leadership-team. In addition, Tailwind has policies, commitments, goals and targets, responsibilities, resources, grievance mechanisms and other specific actions in place to address material topics as outlined throughout the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
	103-3 Evaluation of the management approach	Tailwind's leadership team regularly evaluates the efficacy of their management approach and makes adjustments as needed. Further indication as to the formal and informal mechanisms in place to evaluate Tailwind's leadership approach is available for perusal as requested.	No Omission
GRI 206: Anti- competitive Behaviour 2016	206-1 Legal actions for anti- competitive behaviour, anti-trust, and monopoly practices	There are no legal actions pending and none have been completed during 2021 relating to anti-competitive behaviour or violations of anti-trust and monopoly legislation.	No Omission
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
GRI 103: Management Approach 2016	103-2 The management approach and its components	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
	207-1 Approach to tax	Do not report - Not material	Not Applicable
GRI 207: Tax 2019	207-2 Tax governance, control, and risk management	Do not report - Not material	Not Applicable
	207-3 Stakeholder engagement and management of concerns related to tax	Do not report - Not material	Not Applicable
	207-4 Country-by-country reporting	Do not report - Not material	Not Applicable



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
300 series (Enviro	onmental topics)		
Materials			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	During the extraction of offshore oil and gas, materials, predominantly solid and liquid chemical formulas and compounds, are required. These chemicals may, if legally permissible to do so, be discharged into the marine environment leading to some environmental impact. The boundary of this material topic is all offshore oil and gas exploration and production sites where Tailwind is operator and is legally accountable to the regulator for materials use and discharge. All chemicals used for the extraction and production of oil and gas that require permits are registered in accordance with Environmental Protection Act.	No Omission
	103-2 The management approach and its components	Tailwind has an Environmental, Health and Safety (EHS) Policy (available here: https://www.tailwind.co.uk/Health-and-Safety) and Environmental Management System compliant with ISO 140001: 2015. The EHS is publicly discloses its commitments to environmental compliance. An Environmental, Health and Safety Management System, Legislative and Regulatory Compliance Process and dedicated full time HSE Manager ensure Tailwind can meet its regulatory compliance requirements with respect to all offshore materials and chemicals as required by the UK Offshore Chemical Regulations. All material used and discharged on Tailwind assets is carried out under permits and consents which are assured and approved by the UK offshore environmental regulator, BEIS.	No Omission
	103-3 Evaluation of the management approach	Tailwind's EHS Policy and associated EHS Management System is externally assured every 2 years to ensure it is compliant with the principles of the ISO 14001: 2015 environmental management standard. In addition, Tailwind's EHS Policy is reviewed by the Board of Directors and signed by the Chief Operating Officer. Tailwind assets are subject to regular audits and visits to ensure compliance with the Offshore Chemical Regulations by the environmental regulator, BEIS.	No Omission
GRI 301: Materials 2016	301-1 Materials used by weight or volume	A description of Tailwind's materials and chemicals can be found in section 6.2.1 and the Databook for disclosure 301-1.	No Omission



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	301-2 Recycled input materials used	Do not report - Not material	Not Applicable
	301-3 Reclaimed products and their packaging materials	Do not report - Not material	Not Applicable
Energy			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Energy generation and consumption are required for the offshore production of oil and gas as well as the onshore services provided by Tailwind to support this. Energy generation and use is a material topic as it has a financial impact on the organisation and is responsible for the generation of greenhouse gases. Tailwind's portfolio of both operated and non-operated assets forms the boundary for this topic, with non-operated assets being considered on an equity share basis.	No Omission
	103-2 The management approach and its components	Energy for offshore infrastructure is generated on site as required. Energy use is a business requirement to ensure safe operations from Tailwind assets. Energy management and optimisation is synonymous with efficient operations and as such the operational management systems of Tailwind's operated and non-operated assets ensure that energy use is efficient.	No Omission
	103-3 Evaluation of the management approach	Tailwind assure the operational management systems of their joint venture partners and operating partners through formal channels (joint venture agreements and meetings) on a regular basis.	No Omission
GRI 302: Energy 2016	302-1 Energy consumption within the organization	The types of fuels used across the organisation include gas and fuel oil e.g., diesel. No steam consumption was used. Tailwind do not sell energy in any form as defined by this disclosure. The UK BEIS Greenhouse Gas 2021 Conversion factors are used to calculate emissions from energy consumption. Further information on Tailwind's energy consumption can be found in section 6.2.2 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	302-2 Energy consumption outside of the organization	Do not report - Not material	Not Applicable
	302-3 Energy intensity	A description of Tailwind's energy intensity can be found in section 6.2.2 of the 2021 Tailwind ESG Report available on Tailwind's website and the Databook on for disclosure 302-3.	No Omission
	302-4 Reduction of energy consumption	Do not report - Not material	Not Applicable
	302-5 Reductions in energy requirements of products and services	Do not report - Not material	Not Applicable
Water and Effluents	ı		
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
GRI 103: Management Approach 2016	103-2 The management approach and its components	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Do not report - Not material	Not Applicable
	303-2 Management of water discharge-related impacts	Do not report - Not material	Not Applicable
	303-3 Water withdrawal	Do not report - Not material	Not Applicable
	303-4 Water discharge	Do not report - Not material	Not Applicable
	303-5 Water consumption	Do not report - Not material	Not Applicable



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
Biodiversity			
	103-1 Explanation of the material topic and its Boundary	As an offshore oil and gas exploration and production operator, Tailwind consider biodiversity to be of material importance to their operational and partnership activities. Management and conservation of biodiversity through the direct control of its operated offshore assets and through contractual influence of its non-operated offshore assets represents the boundary for this topic.	No Omission
GRI 103: Management Approach 2016	103-2 The management approach and its components	Tailwind manages the impact it has on biodiversity primarily through compliance with UK offshore environmental legislation which is derived from EU directives. Tailwind understand that change is needed by industry in support of biodiversity and impact on climate change. We are committed to operate new exploration activities outside marine protected areas. Tailwind has an Environmental, Health and Safety Policy which publicly discloses its commitments to environmental compliance which encompasses biodiversity. An Environmental, Health and Safety Management System, Legislative and Regulatory Compliance Process and dedicated full time HSE Manager ensure Tailwind can meet its regulatory compliance requirements with respect to biodiversity as required by the UK law.	No Omission
	103-3 Evaluation of the management approach	Tailwind's EHS Policy and associated Management System is externally assured every 2 years to ensure it is compliant with the principles of the ISO 14001: 2015 environmental management standard. In addition, Tailwind's EHS Policy is reviewed by the Board of Directors and signed by the Chief Operating Officer. Tailwind assets are subject to compliance with the Environmental Impact Assessment regulations 2020 which ensures that permits and consents are assured by BEIS prior to issue for compliance with biodiversity legal requirements.	No Omission



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Do not report - Not material	Not Applicable
	304-2 Significant impacts of activities, products, and services on biodiversity	Do not report - Not material	Not Applicable
GRI 304: Biodiversity 2016	304-3 Habitats protected or restored	Do not report - Not material	Not Applicable
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	A description of Tailwind's impacts on IUCN Red List species can be found in section 6.2.4 of the 2021 Tailwind ESG Report available on Tailwind's website and the Databook on for disclosure 304-4.	No Omission



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
Emissions			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	As an offshore oil and gas exploration and production operator, Tailwind considers atmospheric emissions to be of material importance to their operational and partnership activities. Quantification and minimisation of atmospheric emissions through the direct control of its operated offshore assets and through contractual influence of its non-operated offshore assets represents the boundary for this topic. On this basis, Tailwind will report Scope 1, Scope 2 and material Scope 3 emissions.	No Omission
	103-2 The management approach and its components	Tailwind manages atmospheric emissions associated with all its assets through compliance with UK offshore environmental legislation and the UK Emissions Trading Scheme (UKETS). Tailwind has an Environmental, Health and Safety Policy (available here: https://www.tailwind.co.uk/Health-and-Safety) which publicly discloses its commitments to environmental compliance which encompasses biodiversity. An Environmental, Health and Safety Management System, Legislative and Regulatory Compliance Process and dedicated full time HSE Manager ensure Tailwind can meet its regulatory compliance requirements with respect to atmospheric emissions as required by the UK law, such as Tailwind's requirement to disclose Streamlined Energy and Carbon Reporting (SECR). Tailwind use a bespoke emissions model to capture emissions data provided by operators.	No Omission
	103-3 Evaluation of the management approach	Tailwind's EHS Policy and associated Management System is externally assured every 2 years to ensure it complies with the principles of the ISO 14001: 2015 environmental management standard. In addition, Tailwind's EHS Policy is reviewed by the Board of Directors and signed by the Chief Operating Officer. Tailwind assets are subject to compliance with the Pollution Prevention and Control regulations and the UK Emissions Trading Scheme which ensures that permits and consents are assured by BEIS prior to issue for compliance with biodiversity legal requirements.	No Omission
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	A description of Tailwind's Scope 1 GHG emissions can be found in section 6.4 of the 2021 Tailwind ESG Report available on Tailwind's website and in the Databook on for disclosure 305-1.	No Omission



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	305-2 Energy indirect (Scope 2) GHG emissions	A description of Tailwind's Scope 2 GHG emissions can be found in section 6.4 of the 2021 Tailwind ESG Report available on Tailwind's website and in the Databook for disclosure 305-2.	No Omission
	305-3 Other indirect (Scope 3) GHG emissions	A description of Tailwind's Scope 3 GHG emissions can be found in section 6.4 of the 2021 Tailwind ESG Report available on Tailwind's website and in the Databook disclosure 305-3.	No Omission
	305-4 GHG emissions intensity	A description of Tailwind's GHG emissions intensity can be found in section 6.4 of the 2021 Tailwind ESG Report available on Tailwind's website and in the Databook disclosure 305-4.	No Omission
	305-5 Reduction of GHG emissions	A description of Tailwind's reduction of GHG emissions can be found in section 6.4 of the 2021 Tailwind ESG Report available on Tailwind's website and in the Databook disclosure 305-5.	No Omission
	305-6 Emissions of ozone- depleting substances (ODS)	Do not report - Not material	Not Applicable
	305-7 Nitrogen oxides (NOX), sulphur oxides (SOX), and other significant air emissions	A description of other gases reported by Tailwind can be found in section 6.4 of the 2021 Tailwind ESG Report available on Tailwind's website and in the Databook disclosure 305-7.	No Omission
Effluents and Waste			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	During the extraction of offshore oil and gas, waste and effluents are generated both as by products as well as waste associated with support services and processes. The impact of waste and effluents on the environment can be significant if not managed correctly and Tailwind has identified this as a material topic for its business. The boundary of this material topic is all offshore oil and gas exploration and production sites which are owned and operated by Tailwind where it is legally accountable to the regulator for waste and effluent management.	No Omission



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	103-2 The management approach and its components	Tailwind has an Environmental, Health and Safety Policy (available here: https://www.tailwind.co.uk/Health-and-Safety) which publicly discloses its commitments to environmental compliance. An Environmental, Health and Safety Management System, Legislative and Regulatory Compliance Process and dedicated full time HSE Manager ensure Tailwind can meet its regulatory compliance requirements with respect to waste and effluents as required by the UK law.	No Omission
	103-3 Evaluation of the management approach	Tailwind's EHS Policy and associated Management System is externally assured every 2 years to ensure it is aligned to the principles of the ISO 14001 environmental management standard. Tailwind assets are subject to regular waste management audits. Tailwind regularly monitor their supply chain to ensure compliance with waste and effluent handling and disposal.	No Omission
	306-1 Waste generation and significant waste-related impacts	A description of Tailwind's waste generation and significant waste-related impacts can be found in section 6.2.5 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
	306-2 Management of significant waste-related impacts	A description of Tailwind's management of significant waste-related impacts can be found in section 6.2.5 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
GRI 306: Waste 2020	306-3 Waste generated	A description of waste generated by Tailwind can be found in section 6.2.5 of the 2021 Tailwind ESG Report available on Tailwind's website and the Databook disclosure 306-3.	No Omission
	306-4 Waste diverted from disposal	A description of Tailwind's waste diverted from disposal can be found in section 6.2.5 of the 2021 Tailwind ESG Report available on Tailwind's website and the Databook disclosure 306-4.	No Omission
	306-5 Waste directed to disposal	A description of Tailwind's waste directed to disposal can be found in section 6.2.5 of the 2021 Tailwind ESG Report available on Tailwind's website and the Databook disclosure 306-5.	No Omission



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission		
Environmental Complian	nce				
	103-1 Explanation of the material topic and its Boundary	Regulatory compliance, including environmental compliance, is fundamental to all of Tailwind's activities. It is recognised the environmental compliance forms the basis of Tailwind's licence to operate. Environmental compliance is a material topic which applies to all Tailwind's assets and operations.	No Omission		
GRI 103: Management Approach 2016	103-2 The management approach and its components	Tailwind has an Environmental, Health and Safety Policy (available here: https://www.tailwind.co.uk/Health-and-Safety) which publicly discloses its commitments to environmental compliance. An Environmental, Health and Safety Management System, Environmental Management Process, Legislative and Regulatory Compliance Process and dedicated full time HSE Manager ensure Tailwind can meet its environmental compliance requirements with respect to all aspects of its operations.	No Omission		
	103-3 Evaluation of the management approach	Tailwind's EHS Policy and associated Management System is externally assured every 2 years to ensure it is aligned to the principles of the ISO 14001: 2015 environmental management standard. The EHS Policy is regularly reviewed by the Board of directors and signed by the Chief Operating Officer. The Environmental Management Process and Legislative and Regulatory Compliance Process are regularly reviewed and owned and signed by the Chief Operating Officer and the Legal Counsel respectively.	No Omission		
GRI 307: Environmental Compliance 2016	307-1 Non-compliance with environmental laws and regulations	A description of Tailwind's compliance with environmental laws and regulations can be found in section 6.2 of the 2021 Tailwind ESG Report available on Tailwind's website and the Databook disclosure 307-1.	No Omission		
Supplier Environmental	Supplier Environmental Assessment				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Tailwind is reliant upon its supply chain for the successful delivery of its business model including the exploration and production of oil and gas. It is therefore of material important to Tailwind that its environmental commitments and compliance activities are upheld where applicable in its supply chain across all of its operational activities.	No Omission		



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	103-2 The management approach and its components	Tailwind has an Environmental, Health and Safety Policy (available here: https://www.tailwind.co.uk/Health-and-Safety) which publicly discloses its commitments to environmental compliance. Tailwind has a Contractor Selection and Management process which describes how contractors should be selected and assessed based on key material risks, including environmental risk. Where applicable this process enables controls to be implemented to ensure the contractors meet Tailwind's environmental standards and align with its environmental commitments.	No Omission
	103-3 Evaluation of the management approach	The Contractor Selection and Management process is regularly reviewed for scope and applicability. It is owned and signed by Tailwind's Legal Counsel.	No Omission
GRI 308: Supplier	308-1 New suppliers that were screened using environmental criteria	A description of Tailwind's approach to screening suppliers can be found in section 8.2 of the 2021 Tailwind ESG Report available on Tailwind's website and the Databook disclosure 308-1.	No Omission
Assessment 2016	308-2 Negative environmental impacts in the supply chain and actions taken	Do not report - Not material	Not Applicable
400 series (Social	topics)		
Employment			
	103-1 Explanation of the material topic and its Boundary	Tailwind is a small company and recognises that its employees are its most important assets in delivering its wider business objectives. Employing and retaining the right people is of material importance to Tailwind. This applies to all of Tailwind's operated sites.	No Omission
GRI 103: Management Approach 2016	103-2 The management approach and its components	Tailwind is subject to and complies with all of the applicable UK employment law for an organisation of its size. In addition, Tailwind has a Personnel Selection, Training and Competence process as part of its wider Business Management System. In addition, Tailwind provides an Employee Handbook to all employees which details the organisation's commitments and accountabilities both legally and contractually.	No Omission



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	103-3 Evaluation of the management approach	The Personnel Selection, Training and Competence process is jointly owned and signed by the HSE Manager and the General Counsel. It is regularly reviewed as part of the wider Business Management System. The Employee Handbook is provided to all employees and is signed by employees to ensure that they fully understand Tailwind's commitments as well as their own personal obligations.	No Omission
	401-1 New employee hires and employee turnover	Information about Tailwind's new employees and employee turnover can be found in section 7.1.1 of the 2021 Tailwind ESG Report available on Tailwind's website and the Databook disclosure 401-1.	No Omission
GRI 401: Employment 2016	401-2 Benefits provided to full- time employees that are not provided to temporary or part- time employees	Do not report - Not material	Not Applicable
	401-3 Parental leave	Information on parental leave can be found in the Databook disclosure 401-3.	No Omission
Labour / Management F	Relations		
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
GRI 103: Management Approach 2016	103-2 The management approach and its components	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
GRI 402: Labour/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	Do not report - Not material	Not Applicable



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
Occupational Health and	d Safety		
	103-1 Explanation of the material topic and its Boundary	Occupational Health and Safety is of material importance to Tailwind and the safety of our people and the wider society in which Tailwind operates is of primary importance to the organisation. Tailwind manages and reports the occupational Health and Safety aspect for which it has legal accountability across its owned and operated sites. Non-operated sites controlled by third parties are not within the scope of this disclosure.	No Omission
GRI 103: Management Approach 2016	103-2 The management approach and its components	Tailwind has an Environmental, Health and Safety Policy (available here: https://www.tailwind.co.uk/Health-and-Safety) which publicly discloses its commitments to occupational Health and Safety compliance. An Environmental, Health and Safety Management System and Legislative and Regulatory Compliance Process and dedicated full time HSE Manager ensure Tailwind can meet its environmental compliance requirements with respect to all aspects of its operations.	No Omission
	103-3 Evaluation of the management approach	Tailwind's EHS Policy and associated Management System is externally assured every 2 years to ensure it is aligned to the principles of the ISO 14001 environmental management standard. In addition, the occupational Health and Safety elements of the Management System are regularly reviewed and updated in line with regulatory developments and good industry practice. The EHS Policy is regularly reviewed by the Board of directors and signed by the Chief Operating Officer. The Legislative and Regulatory Compliance Process are regularly reviewed and owned and signed by the Legal Counsel.	No Omission
	403-1 Occupational health and safety management system	A description of Tailwind's health and safety management system can be found in section 7.2 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
GRI 403: Occupational Health and Safety 2018	403-2 Hazard identification, risk assessment, and incident investigation	A description of Tailwind's hazard, risk assessment and incident investigation can be found in section 7.2 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
	403-3 Occupational health services	Do not report - Not material	Not Applicable



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	403-4 Worker participation, consultation, and communication on occupational health and safety	Do not report - Not material	Not Applicable
	403-5 Worker training on occupational health and safety	A description of Tailwind's provision of worker training on health and safety can be found in section 7.2 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
	403-6 Promotion of worker health	A description of Tailwind's promotion of worker health can be found in section 7.1.3 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	A description of Tailwind's prevention and mitigation of health and safety impacts directly linked by business relationships can be found in section 7.2 of the 2021 Tailwind ESG Report available on Tailwind's website.	No Omission
	403-8 Workers covered by an occupational health and safety management system	A description of Tailwind's workers covered by the EHS Management System can be found in section 7.2 of the 2021 Tailwind ESG Report available on Tailwind's website and the Databook disclosure 403-8.	No Omission
	403-9 Work-related injuries	Information on Tailwind's work-related injuries can be found in section 7.2 of the 2021 Tailwind ESG Report available on Tailwind's website and the Databook disclosure 403-9.	No Omission
	403-10 Work-related ill health	Information on Tailwind's work-related ill-health can be found in section 7.2 of the 2021 Tailwind ESG Report available on Tailwind's website and the Databook disclosure 403-10.	No Omission
Training and Education			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Tailwind is a small company and recognises that its employees are its most important assets in delivering its wider business objectives. The continued development of employees through ongoing training and education appropriate to the wider business is of material importance to Tailwind.	No Omission
	103-2 The management approach and its components	Tailwind has a Personnel Selection, Training and Competence process as part of its wider Business Management System.	No Omission



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	103-3 Evaluation of the management approach	The Personnel Selection, Training and Competence process is jointly owned and signed by the HSE Manager and the General Counsel. It is regularly reviewed as part of the wider Business Management System.	No Omission
	404-1 Average hours of training per year per employee	Information on the average amount of training per year per employee can be found in section 7.1.2 of the 2021 Tailwind ESG Report available on Tailwind's website and the Databook disclosure 404-1.	No Omission
GRI 404: Training and Education 2016	404-2 Programs for upgrading employee skills and transition assistance programs	Do not report - Not material	Not Applicable
	404-3 Percentage of employees receiving regular performance and career development reviews	Do not report - Not material	Not Applicable
Diversity and Equal Opp	ortunity		
	103-1 Explanation of the material topic and its Boundary	Tailwind is a small company and recognises that its employees are its most important assets in delivering its wider business objectives. Tailwind is committed to being an equal opportunities employer. This applies to all of Tailwind's operated sites.	No Omission
GRI 103: Management Approach 2016	103-2 The management approach and its components	Tailwind is subject to and complies with all of the applicable UK employment law for an organisation of its size, which covers all personnel protected characteristics which are enshrined in UK law. In addition, Tailwind has a Personnel Selection, Training and Competence process as part of its wider Business Management System. Tailwind provides an Employee Handbook to all employees which details the organisation's commitments and accountabilities both legally and contractually.	No Omission
	103-3 Evaluation of the management approach	The Personnel Selection, Training and Competence process is jointly owned and signed by the HSE Manager and the General Counsel. It is regularly reviewed as part of the wider Business Management System. The Employee Handbook is provided to all employees and is signed by employees to ensure that they fully understand Tailwind's commitments as well as their own personal obligations.	No Omission



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
GRI 405: Diversity and Equal Opportunity	405-1 Diversity of governance bodies and employees	Information on Tailwind's diversity of governance bodies and employees can be found in section 7.1.1 of the 2021 Tailwind ESG Report available on Tailwind's website and the Databook disclosure 405-1.	No Omission
2016	405-2 Ratio of basic salary and remuneration of women to men	Do not report - Not material	Not Applicable
Non-discrimination			
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
GRI 103: Management Approach 2016	103-2 The management approach and its components	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
GRI 406: Non- discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Do not report - Not material	Not Applicable
Freedom of Association	and Collective Bargaining		
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
GRI 103: Management Approach 2016	103-2 The management approach and its components	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Do not report - Not material	Not Applicable



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
Child Labour			
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
GRI 103: Management Approach 2016	103-2 The management approach and its components	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
GRI 408: Child Labour 2016	408-1 Operations and suppliers at significant risk for incidents of child labour	Do not report - Not material	Not Applicable
Forced or Compulsory La	abour		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
	103-2 The management approach and its components	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
GRI 409: Forced or Compulsory Labour 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	Do not report - Not material	Not Applicable
Security Practices			
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
GRI 103: Management Approach 2016	103-2 The management approach and its components	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	Do not report - Not material	Not Applicable
Rights of Indigenous Peo	pples		
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
GRI 103: Management Approach 2016	103-2 The management approach and its components	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	Do not report - Not material	Not Applicable
Human Rights Assessme			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Tailwind is a small company and recognises that its employees are its most important assets in delivering its wider business objectives. Tailwind is committed to being an equal opportunities employer. This applies to all of Tailwind's operated sites.	No Omission
	103-2 The management approach and its components	Tailwind is subject to and complies with all of the applicable UK employment law for an organisation of its size, which covers all personnel protected characteristics which are enshrined in UK law. In addition, Tailwind has a Personnel Selection, Training and Competence process as part of its wider Business Management System. Tailwind provides an Employee Handbook to all employees which details the organisation's commitments and accountabilities both legally and contractually.	No Omission
	103-3 Evaluation of the management approach	The Personnel Selection, Training and Competence process is jointly owned and signed by the HSE Manager and the General Counsel. It is regularly reviewed as part of the wider Business Management System. The Employee Handbook is provided to all employees and is signed by employees to ensure that they fully understand Tailwind's commitments as well as their own personal obligations.	No Omission



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	412-1 Operations that have been subject to human rights reviews or impact assessments	Do not report - Not material	Not Applicable
GRI 412: Human Rights Assessment	412-2 Employee training on human rights policies or procedures	Information on employee training on human rights policies or procedures can be found in the Databook disclosure.	No Omission
2016	412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	Do not report - Not material	Not Applicable
Local Communities			
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
GRI 103: Management Approach 2016	103-2 The management approach and its components	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Do not report - Not material	Not Applicable
Communities 2016	413-2 Operations with significant actual and potential negative impacts on local communities	Do not report - Not material	Not Applicable
Supplier Social Assessment			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
	103-2 The management approach and its components	Do not report - Not material	Not Applicable



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
GRI 414: Supplier	414-1 New suppliers that were screened using social criteria	Do not report - Not material	Not Applicable
Social Assessment 2016	414-2 Negative social impacts in the supply chain and actions taken	Do not report - Not material	Not Applicable
Public Policy			
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
GRI 103: Management Approach 2016	103-2 The management approach and its components	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
GRI 415: Public Policy 2016	415-1 Political contributions	Do not report - Not material	Not Applicable
Customer Health and Sa	fety		
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
GRI 103: Management Approach 2016	nt 103-2 The management	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Do not report - Not material	Not Applicable
	416-2 Incidents of non- compliance concerning the health and safety impacts of products and services	Do not report - Not material	Not Applicable



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
Marketing and Labelling			
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
GRI 103: Management Approach 2016	103-2 The management approach and its components	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
	417-1 Requirements for product and service information and labelling	Do not report - Not material	Not Applicable
GRI 417: Marketing and Labelling 2016	417-2 Incidents of non- compliance concerning product and service information and labelling	Do not report - Not material	Not Applicable
	417-3 Incidents of non- compliance concerning marketing communications	Do not report - Not material	Not Applicable
Customer Privacy			
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
GRI 103: Management Approach 2016	103-2 The management approach and its components	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Do not report - Not material	Not Applicable



GRI Standard	Disclosure	Location/Information (Page numbers and/or URL)	Omission
Socioeconomic Complia	nce		
	103-1 Explanation of the material topic and its Boundary	Do not report - Not material	Not Applicable
GRI 103: Management Approach 2016	103-2 The management approach and its components	Do not report - Not material	Not Applicable
	103-3 Evaluation of the management approach	Do not report - Not material	Not Applicable
GRI 419: Socioeconomic Compliance 2016	419-1 Non-compliance with laws and regulations in the social and economic area	Do not report - Not material	Not Applicable



## Appendix 3 - Tailwind 2021 SASB Disclosure



## 2021 Tailwind SASB: Oil and Gas Exploration and Production Standard

Code	Response
Greenhouse Gas Emissions	
EM-EP-110a.1	Tailwind utilises the GHG Protocol to underpin emissions quantification and reporting for Scopes 1, 2 and 3. Scope 1 emissions consist of 34,912 tCO <sub>2</sub> e across its operating assets as defined in Section 5 of the 2021 Tailwind ESG Report, available on Tailwind's website. 2.99% of Tailwind's Scope 1 emissions are related to methane. At the end of the reporting period (December 2021) 0% of Tailwind's Scope 1 emissions were covered by the UK Emissions Trading Scheme.
EM-EP-110a.2	Tailwind's Scope 1 emissions include 4,564 tCO <sub>2</sub> e associated with flared hydrocarbons, 29,696 tCO <sub>2</sub> e from other combustion sources including power generation, 171 tCO <sub>2</sub> e from vented hydrocarbons and 470 tCO <sub>2</sub> e from fugitive emissions. These emissions are associated specifically with the Conwy asset which was divested by Tailwind in June 2021. All emissions disclosed in this section are quantified using the GHG Protocol and reported to the UK Regulator under the European Emissions Monitoring Scheme (EEMS).
EM-EP-110a.3	A full description of Tailwind's approach to emissions management and associated reduction, both as an organisation and through the support provided to industry initiatives and compliance is provided in Section 6 of the 2021 Tailwind ESG Report, available on Tailwind's website.
Air Quality	
EM-EP-120a.1	The air quality emissions disclosures associated with Tailwind activities cover both operated and non-operated assets. These include:  166 tonnes of NO <sub>x</sub> emissions from operated assets as well as 360 tonnes from non-operated assets; 72 tonnes of SO <sub>x</sub> emissions from operated assets as well as 6.30 tonnes from non-operated assets; and 191 tonnes of VOC emissions from operated assets as well as 175.09 tonnes from non-operated assets.  There were no material POP, HAP, PM or other air quality related emissions from any of Tailwind's activities in 2021. All air quality related emissions reported by Tailwind are calculated using the European Emissions Monitoring Scheme (EEMS) methodology as required by the UK regulatory authority.



Code	Response
Water Management	
EM-EP-140a.1	No freshwater is directly withdrawn on any operated Tailwind site or facility. Tailwind's only operated asset in 2021 was a normally unattended installation (NUI) and operates a closed-loop production system to the host platform.
EIVI-EP-14Ud.1	In reference to the World Resource Institute's (WRI) Water Risk Atlas tool, Aqueduct, Tailwind does not operate in a region of High or Extremely High Baseline Water Stress and has no future plans to do so.
EM-EP-140a.2	Tailwind's only operated asset in 2021 was a normally unattended installation (NUI) and operates a closed-loop production system to the host platform. No produced water was generated or discharged at this facility.
EM-EP-140a.3	Tailwind does not have any operations which utilise hydraulic fracturing. Any hydraulic fracturing chemicals or fluid used in operations would be subject to the UK regulatory authority approval process which is subject to public consultation and approval.
EM-EP-140a.4	Tailwind does not have any operations which utilise hydraulic fracturing.
<b>Biodiversity Impacts</b>	
EM-EP-160a.1	Tailwind's accountability for environmental management is discharged through its Environmental, Health and Safety Management System. This system delivers the commitments of the Tailwind Environmental, Health and Safety Policy which can be found here on the Tailwind website: https://www.tailwind.co.uk/Environmental-Health-Safety-Policy.  Accountability for environmental protection runs throughout the company, with employees and contractors expected to contribute equally to environmental best practices and actively encouraged to challenge working practices and procedures where they think improvements can be made.  All of Tailwind's operations are undertaken in the UK and are subject to the UK regulatory authority's environmental approval process. As such, environmental impact assessments (EIAs) are undertaken for all operations, unless regulatory dispensation is granted based on the operations posing a lower environmental risk. All operations are subject to environmental permits and consents, the compliance with which represent the minimum asset level environmental plan.



Code	Response
EM-EP-160a.2	Tailwind recorded no hydrocarbon or chemical spills in 2021.
EM-EP-160a.3	Tailwind has no net proved reserves in sites with protected conservation status.  Tailwind's (now relinquished) Conwy asset was located in Liverpool Bay, UK which is an area populated with basking sharks, a species assessed as Endangered under criteria A2bd of the IUCN Red List. Environmental permits for this asset were granted with conditions which ensured protection of this species by the UK regulator authority and were subject to public consultation.
	Tailwind has no net probable reserves in sites with protected conservation status or in areas of endangered species habitat.
Security, Human Rights & Rights	of Indigenous Peoples
EM-EP-210a.1	Tailwind has no net proved or net probable reserves located in or near areas of active conflict.
EM-EP-210a.2	Tailwind has no net proved or net probable reserves located in or near areas that are considered to be indigenous peoples' land.
EM-EP-210a.3	Tailwind's Code of Conduct (a summary of which can be found here: https://www.tailwind.co.uk/Governance) forms the basis of a UK regulatory compliant governance system which ensures due diligence and process is applied to human rights, indigenous rights, and operation in areas of conflict.  Tailwind's current and projected future operations do not occur in areas where human rights, indigenous rights, and operation in areas of conflict are considered risks, however our strict governance processes ensure that these topics are enshrined in our management and due diligence activities.



Code	Response
Community Relations	
EM-EP-210b.1	All of Tailwind's operations are located offshore in the UK. The process for community engagement on economic rights, environmental rights and interests, social rights and cultural rights is protected by UK legislation. The permitting and consenting process for UK offshore oil and gas activities includes both statutory and public consultation. All of Tailwind's operational activities have be subject to this process.  The Tailwind Environmental, Health and Safety Management System in communication with the Tailwind Code of Conduct (a summary of which can be found here: https://www.tailwind.co.uk/Governance) ensure that operations are undertaken transparently, in compliance with all relevant laws and regulations and with due consideration to the rights and interests of community groups.  As an active operating partner and contractor manager, Tailwind uses its influence to communicate encourage our approach across our value chain.
EM-EP-210b.2	Tailwind had no site shutdowns or project delays due to non-technical factors including demonstrations, protests, permit or consent challenges, regulatory prohibition or non-compliance.
Workforce Health & Safety	
EM-EP-320a.1	Tailwind had no recorded work-related injuries, illness or fatalities to full-time, part-time, contract or short-service personnel in 2021.  In 2021, Tailwind divested its single operated asset for which it has direct operated health and safety accountability. As such, no health, safety, and emergency management training for any personnel was undertaken. Tailwind is committed to safe operations and future operated assets will be subject to a rigorous and regulatory compliant training and awareness programme as required.



Code	Response
EM-EP-320a.2	Tailwind operates under an integrated Environmental, Health and Safety (EHS) Management System in which all workers fall under which is externally verified to ensure it meets the principles of ISO14001. The system follows the traditional and recognised methodology of Organise, Plan, Do, Assess, Adjust which ensures a universally recognised approach. The EHS Management System covers all of Tailwind's operated assets both onshore and offshore. All Tailwind controlled and accountable workers, activities, and workplaces are covered by the EHS Management System.  Tailwind has a hazard identification, risk assessment, and incident reporting and investigation process are part of its EHS Management System. Every process in the EHS Management System is regularly reviewed for applicability by the HSE Manager and owned by the Chief Operating Officer. This ensures that the processes remain applicable and up to date with regulations, industry best practice and operational changes.
Reserves Valuation & Capital Exp	penditures
EM-EP-420a.1	There is currently a comparatively low sensitivity of the existing Tailwind reserves portfolio to carbon emissions pricing based on its projected value alongside other operating costs. Tailwind continues to monitor this sensitivity as part of its ongoing reserves management process.
EM-EP-420a.2	Tailwind does not currently calculate the embedded carbon dioxide emissions in its proved hydrocarbon reserves, however it takes accountability for all emissions associated with production through an equity share approach to UK Emissions Trading Scheme participation with its joint venture and operating partners.
EM-EP-420a.3	Tailwind does not currently invest in renewable energy assets but utilises a renewable energy tariff in its onshore offices. Tailwind currently generates no revenue from renewable energy sales.
EM-EP-420a.4	In 2021, Tailwind undertook a climate risk and opportunities assessment as part of its alignment with the Task Force on Climate-related Financial Disclosures (TCFD) recommendations. This assessment was undertaken based on various, published scenarios by the International Energy Agency (IEA) which considered hydrocarbon demand, price projections and future climate-related regulation and associated emissions costs.  This risk and opportunities assessment is owned by the Tailwind board and is one of the tools used when considering the opportunities for exploration, acquisition and development of assets.



Code	Response
Business Ethics & Transparency	
EM-EP-510a.1	Tailwind currently has no proved reserves or probable reserves in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index.
EM-EP-510a.2	Tailwind encourages employees, contractors and third parties to ask questions, voice concerns, and report any alleged violations of the Code of Conduct or any other company policies. Employees and relevant contractors receive in-person training on the Code of Conduct and company policies when joining Tailwind, and refresher training is provided annually. There have been no reported or confirmed incidents of corruption during the year. There are no legal actions taken or pending against Tailwind relating to anti-competitive behaviour or violations of anti-trust and monopoly legislation during the year. Tailwind also adheres to and abides by the Wates Principles to demonstrate good practice and achieve value for our investors, employees and wider society. The six principles include the effective of The Board, Board composition, Director responsibilities, opportunity and risk management, fair and considerate remuneration and stakeholder engagement.
Management of the Legal & Regi	ulatory Environment
EM-EP-530a.1	In 2021, Tailwind undertook a climate risk and opportunities assessment as part of its alignment with the Task Force on Climate-related Financial Disclosures (TCFD) recommendations. This, in combination with the existing Board risk identification and management process, ensures that Tailwind remains prepared to address the social and environmental factors affecting the UK oil and gas industry.  Tailwind is aligned with the UK North Sea Transition Deal which supports a just energy transition and an evolution to Net Zero. This deal focuses on material aspects including supply chain decarbonisation, carbon capture and storage, hydrogen, supply chain transformation and people and skills at a
	sector level in the UK.
Critical Incident Risk Managemen	nt
EM-EP-540a.1	Tailwind suffered no Process Safety Events (PSE) resulting in Loss of Primary Containment (LOPC) in 2021.
EM-EP-540a.2	Tailwind's Environmental, Health and Safety Management System is the management process used to identify and mitigate catastrophic and tail-end risks. This system delivers the commitments of the Tailwind Environmental, Health and Safety Policy which can be found here on the Tailwind website: https://www.tailwind.co.uk/Environmental-Health-Safety-Policy.
	Tailwind ensures that sufficient in-house competence and capability as well as third party specialist emergency response support and oil spill contingency is sourced to support all offshore operations it is directly responsible for.



Code	Response
General Disclosure	
EM-EP-000.A	Tailwind's 2021 oil production was 4.94 mmbbl.
	Tailwind's 2021 gas production was 2.82 bscf.
EM-EP-000.B	Tailwind operated 1 offshore site, Conwy, for 6 months in 2021 before relinquishment.
EM-EP-000.C	Tailwind does not have any terrestrial operated sites.