

2025 Sustainability Report

Delivering Clean, Efficient and Reliable Energy

Welcome to Primary Energy's 2025 Sustainability Report

Primary Energy is proud to introduce our third annual Sustainability Report, representing our continued growth and progress.

For nearly 30 years, Primary Energy has done one thing exceptionally well: we capture waste heat from industrial processes and convert it into clean energy. That work has never been more relevant. As a leader in delivering lower carbon, efficient and reliable energy at a reduced cost, we recognize the importance of transparently communicating our sustainability progress to all our stakeholders – including employees, customers, investors, community leaders and business partners.

The topics covered in this report have been guided by a preliminary sustainability topic identification study and shaped by SDCL Efficiency Income Trust plc's (SEIT) sustainability focus areas. The report also outlines our contributions to the United Nations' Sustainable Development Goals (SDGs), which address key global challenges, including climate change. This report covers our sustainability impact, policies, programs and performance from January 1, 2025, to December 31, 2025, unless otherwise noted. Statements provided may be based on estimates, assumptions and projections, and are subject to change as we continually enhance our data management practices, data sources and calculation methodologies. The content of this report was provided by Primary Energy managers and subject matter experts and approved by executive leaders.

In 2025, Primary Energy successfully amended its application under the Ohio Renewable Portfolio Standard (RPS) program, expanding North Lake's carbon market eligibility from voluntary to compliance. This achievement resulted from ongoing investments and improvements that enabled North Lake to meet the threshold for providing significantly more clean energy credits in the compliance market.

We invite you to explore this report and learn more about our initiatives and progress in reducing emissions from energy-intensive sectors and promoting the use of clean energy. If you have any comments or questions, please reach out to sustainability@primaryenergy.com.

About Primary Energy

Primary Energy helps North American industries become more efficient, enhancing their environmental performance and competitiveness with imports. We create value for our customers by capturing and recycling waste energy from industrial and power generation processes and delivering efficient and reliable energy at a reduced cost, benefiting both our customers and the planet.

What is Energy Recycling?

Energy recycling is the recovery of energy that would otherwise be lost in industrial processes through flaring, exhausting the atmosphere, or operating low-efficiency equipment. Instead, we help capture this energy so it can be used, converting it into electricity or thermal energy (steam).

Combined heat and power (CHP) is a form of energy recycling, where power generation facilities are designed to produce energy and supply heat rather than waste it. Energy recycling and CHP can be implemented at industrial sites, manufacturing facilities, and large institutions such as hospitals and universities.

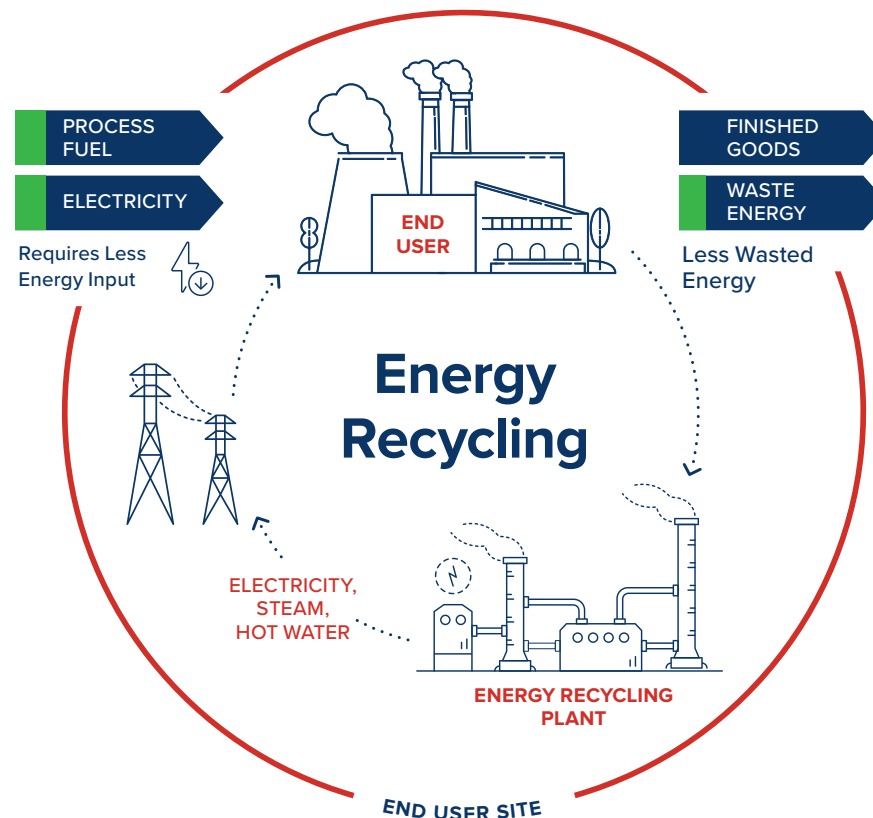
Our innovative technology and expertise enable our customers, including steel manufacturers and industrial facilities, to:

- Reduce energy costs by converting waste heat into usable electricity and thermal energy
- Increase operational efficiency by maximizing CHP systems
- Shift fuel sources from coke to alternatives like pulverized coal
- Lower emissions by capturing more heat from blast furnaces and coke ovens
- Increase revenue by selling converted energy

Primary Energy is wholly owned by SEIT, which is managed by SDCL, a London-based investment firm with a proven track record of supporting energy efficiency and decentralized generation projects across the United States, Europe and Asia. This partnership allows Primary Energy to deliver innovative, clean energy solutions that create value for our customers and shareholders while reducing environmental impact.

Our Mission

Our mission is to be one of the best performing owners and operators of waste fuel, natural gas,* and heat-to-steam and power-producing facilities in North America.



*Natural gas is a green energy resource in Indiana and Ohio.

Portfolio

Primary Energy owns and operates four recycled energy projects and has a 50% interest in a pulverized coal facility. This portfolio has a combined electrical generating capacity of 298 megawatts (MW) and a combined steam generating capacity of 1.8 thousand pounds (Klbs) per hour. The strong environmental benefits of our waste-to-energy projects qualify for both compliance and voluntary market Renewable Energy Certificates, adding a layer of value generation that we can pass down to our customers.

298 MW
combined electrical
generating capacity
of our portfolio

1.8 Klbs
combined steam
generating capacity
of our portfolio

1,069,949
total compliance and
voluntary market
Renewable Energy
Certificates

Our Energy Recycling Portfolio by Facility

HOST	PROJECT	DESCRIPTION	FUEL TYPE	TECHNOLOGY	CAPACITY	RENEWABLE ENERGY CERTIFICATES
CLEVELAND CLIFFS						
	Cokerenergy	Waste heat recycled into electricity and steam	Waste heat	Steam turbine	Electric: 95 MW; Steam: 896 Klbs/Hr	419,683
	North Lake	Recycles byproduct fuel into electricity	Blast furnace gas and natural gas	Steam turbine	Electric: 90 MW	650,266
	PCI Associates⁽¹⁾	Pulverizes coal for use in blast furnace	N/A	Pulverized coal	Metallurgical Coal: 110 tons/hr ⁽²⁾	—
	Ironside⁽³⁾	Recycles byproduct fuel into electricity	Blast furnace gas and natural gas	Steam turbine	Electric: 50 MW; Steam: 460 Klbs/Hr	—
U.S. STEEL						
	Portside	High-efficiency electricity, steam and hot water	Natural gas	Combined cycle	Electric: 63 MW; Steam: 500 Klbs/Hr; Hot water: 3,000 GPM	—

1. Harbor Coal LLC, an indirect subsidiary of Primary Energy, owns a 50% general partnership interest in PCI Associates which in turn owns the Harbor Coal Project. The use of PCI Associates reduces the amount of coke needed in the blast furnace.
2. This represents the capacity of pulverized coal to be sent to the blast furnace, from which the extracted gas is later recycled in the boiler house and North Lake Facility.
3. Ironside is currently operating as a combined heat and power utilizing natural gas due to the idling of the blast furnace.

Our Sustainability Approach

At Primary Energy, we are committed to integrating sustainability principles into the core of our business operations. Guided by SEIT's sustainability focus areas, our approach to driving responsible growth includes:



Core Values

We are committed to:

- 1. Safety:** Maintaining and/or exceeding safety standards in our workplace.
- 2. Operational Excellence:** Delivering value to our customers, which requires that we operate our facilities in a way that is safe, reliable, and environmentally responsible.
- 3. Integrity, Honesty and Respect:** Doing what is right for our company and the employees that operate within it. A culture where collaboration is conducted with respect and integrity is our highest priority.
- 4. Teamwork:** Fostering a team-oriented culture where we work toward common goals, create a positive atmosphere, and support each other to enhance team performance and results.
- 5. Accountability:** Holding ourselves responsible for delivering results and doing the right thing, cultivating a culture focused on open, honest and respectful communication.
- 6. Inclusivity and Diversity:** Respecting individuality and everyone's ability to make a positive contribution to achieving our company's goals and objectives.

CEO Message

Sustainability is at the heart of the clean energy business Primary Energy has been operating for nearly 30 years, and we are committed to enhancing performance and disclosing our efforts for years to come. In our third annual Sustainability Report, we highlight progress and initiatives in 2025 across our focus areas: championing energy efficiency, delivering environmental impact, operating responsibly, and supporting our communities.

In 2025, our facilities generated approximately 1,400 GWh of electricity from recycled energy, helping our customers avoid an estimated 792,000 metric tons of CO₂e emissions. To put that in perspective, that's enough to power roughly 165,000 homes for a year. It's the kind of impact that only comes from decades of operational discipline and deep integration with our customers.

Championing energy efficiency

This year, North Lake achieved full participation in the Ohio compliance renewable energy market at its full 90 MW capacity. We also advanced new project opportunities into initial feasibility and development. Industrial waste heat across North America remains largely uncaptured, and we see significant opportunity to bring our model to new partners and facilities.

Delivering environmental impact

At Cokenergy, our filter bag replacement program reached 75% completion, and variable speed drive installations will reduce operational energy consumption by nearly 3 MW when commissioned in 2026. We maintained consistently low vented emissions and zero deviations from our Title V air quality permit.

Operating responsibly

North Lake celebrated eight years injury-free and Portside reached seven. We had one employee injury at Cokenergy and shared findings across all facilities to reinforce safe work practices. For contracted labor, we've had one injury in nearly 15 years.

Supporting our communities

We expanded our internship program with Maine Maritime Academy, grew supplier engagement to include sustainability metrics and minority-owned business tracking, and partnered with organizations like We Care From the Heart and Hesed House to support roughly 100 local families.

As we grow, our mission stays the same: collaborate with best-in-class partners, reduce emissions associated with hard-to-abate sectors, and create long-term value for our customers, our team, and our communities.

Thank you to the Primary Energy team, our customers, the local communities where we live and work, and our investors for their partnership and trust as we continue driving positive environmental impact while creating long-term value.

Sincerely,

Mo Klefeker

President and Chief Executive Officer



Mo Klefeker
President and
Chief Executive Officer

Champion Energy Efficiency

Our Approach to Energy Efficiency

Championing energy efficiency is inherent to our business. For nearly three decades, we've helped carbon-intensive industries reduce their environmental impact and increase efficiency through cost-effective clean energy solutions. We create value for our customers in steel and industrial manufacturing by capturing and recycling waste energy from industrial and electric generation processes and converting it into reliable and economical electricity and thermal energy. Across our five facilities, our innovative technology captures more heat from blast furnaces and coke ovens, maximizes CHP efficiency and shifts fuel from coke to pulverized coal, helping organizations lower their emissions and energy costs.

Primary Energy's behind the meter clean energy portfolio also supports the electric grid system. In June 2023, Primary Energy was certified as a Market Participant in the Midcontinent Independent System Operator (MISO) electricity market. This marked an important step in our continued efforts to leverage our behind-the-meter generation assets in support of broader grid reliability and resource adequacy, while continuing to provide reliable, efficient energy to our direct customers.

ENERGY EFFICIENCY HIGHLIGHTS

~1,400

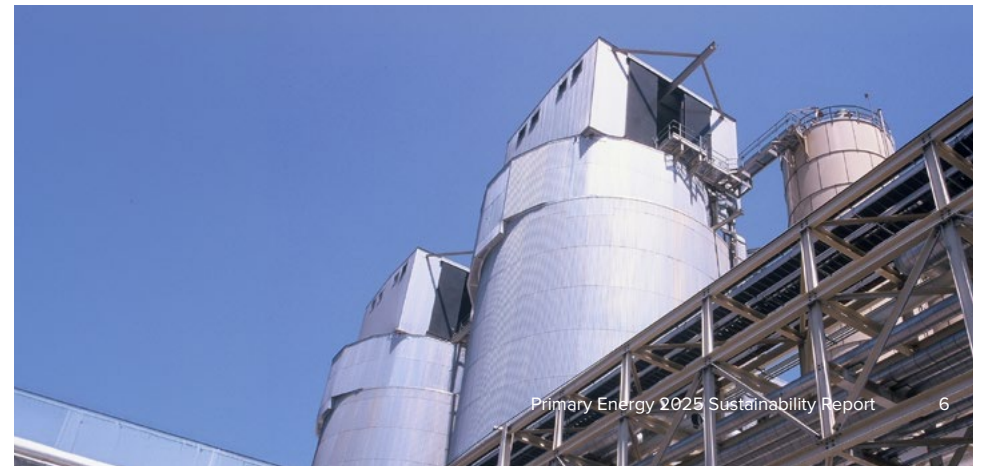
Gigawatt-hours (GWh) of electricity generated

141

GWh of thermal energy and electricity saved through energy efficiency projects

~792,000

Metric tons of CO₂e emissions avoided through generating lower carbon energy for customers



Energy Generation & Avoided Emissions

In 2025, our recycled energy projects generated approximately 1,400 GWh of electricity for our customers, enabling them to avoid an estimated 792,000 MT of CO₂e emissions. This is equivalent to approximately 165,000 homes' electricity use in one year.

Energy Generation & Savings by Facility

METRIC	COKENERGY	NORTH LAKE	PCI ASSOCIATES	IRONSIDE	PORTSIDE
Energy Savings (MWh)	—	—	—	—	141,450
Carbon Savings (tCO ₂ e)	302,447	433,982	605	35,351	19,750
Electricity Generated (MWh)	419,683	648,816	—	65,819	283,696
Heat Generated (MWh)	382	—	—	—	305
GHG Emissions (tCO ₂ e)	0	33,166	0	43,653	216,919



Emissions Management

We recognize the importance of transparent and accountable greenhouse gas (GHG) emissions management and are taking proactive steps to measure our Scope 1, 2, and 3 emissions. We continue working with a third-party consulting firm to ensure our methodologies align with global best practices. This work remains in progress and results will be published once formalized. Our focus is on continuous improvement as we work to enhance our practices, transparently share our progress and drive meaningful emissions reductions.



Energy Efficiency Initiatives

Improving Energy Efficiency at Cokenergy



Filter Bag Replacement

We continue to progress in our multi-year program to replace the filter bags in the baghouse at our Cokenergy facility with an improved design. These new bags reduce pressure drop across the system, allowing our induced draft (ID) fans to operate more efficiently and consume less energy. Approximately 75% of the filter bags have been replaced as of year-end 2025, and we are on track to reach 100% by 2026.



Variable Speed Drives on ID Fan Motors

In conjunction with the filter bag replacements, we continue to implement variable speed drives on ID fan motors, allowing us to precisely regulate the energy required to operate the fans based on operating conditions. This project aims to reduce the energy consumed in facility operations by almost 3 MW through improved efficiency. “Installation began in 2025 and equipment will be fully commissioned in 2026.



Scaling our Impact at North Lake

In 2025, Primary Energy achieved a significant milestone by expanding North Lake’s participation from the voluntary Renewable Energy Certificate market into the Ohio Renewable Portfolio Standard compliance market at its full 90 MW capacity. This transition means that the clean energy generated at North Lake now qualifies for compliance-grade certificates, a more rigorous standard that carries greater market value and directly supports state-level clean energy mandates.

This achievement was made possible by a multi-year upgrade program at the North Lake facility. While a previous project had expanded the facility from 75 to 90 MW, consistent operation at that full capacity required further investments across the facility’s turbine, generator, cooling, and control systems. Together, these improvements resulted in an approximately 22% increase in gross power output on an annual average basis, enabling North Lake to meet the performance threshold required for full compliance certification.

Deliver Positive Environmental Impact

Our Approach

Environmental sustainability is intrinsically tied to the nature of our business in delivering clean energy to our customers. For nearly 30 years, Primary Energy has done one thing exceptionally well: turning industrial waste energy into clean, reliable power while maintaining a strong track record of environmental compliance and stewardship.

Air Quality Impact

Lowering Air Pollution Through Sulfur Dioxide Reduction

For the past three decades, we have helped enable significant reductions in sulfur dioxide emissions and air pollution from steel mills through our recycled energy sources.

Aligning With Air Quality Standards

We remain committed to complying with air quality standards. We closely monitor our emissions and report any deviations from our Title V air quality compliance operating permit on a quarterly basis, as well as compiling an annual compliance certification at the end of each year. In 2025, we had no deviations from our Title V permit. The last deviation occurred in 2024, and we continuously seek to maintain zero deviations.

Reducing Vented Emissions

In 2025, we maintained consistently low vented emissions at the Cokenergy plant. The coke plant's emergency vent stacks, which sit on top of the coke ovens, release emissions if they are open (for maintenance or other planned activities). Keeping the emissions vented low allows us to capture more heat, which increase steam production for the plant.





Waste Management and Recycling Initiatives

Used Oil Recycling

We continue to collect and recycle used oil from machinery oil changes, which is re-refined into other beneficial products. For 2025 we recycled approximately 500 gallons of used oil.

Equipment Material, Steel Scrap, and Refuse Recycling

We continue to recycle scrap materials, including steel from equipment, refuse and other materials from our facilities, helping to minimize the volume of waste sent to landfills. For 2025 we shipped over 200 tons of scrap metal for recycling.

Waste Compliance

We also maintain a strong track record of compliance across other environmental programs, such as the Resource Conservation and Recovery Act related to waste management. In 2025, we had no incidents, spills or noncompliance events within our waste management program.



Water Management

Cokenergy – Recycling Water Used in Boiler Wash Process

We recycle the water used in the boiler wash process, which is essential for maintaining the efficiency and operational integrity of our boilers. By recycling the water, we not only reduce our demand for water but also minimize the volume of wastewater generated. We recycle an estimated 7,000 gallons of water per year, which otherwise would be disposed of as waste.

North Lake – Reducing Cooling Tower Water Footprint

We implemented a chemistry program designed to reduce the water footprint associated with our cooling tower operations, which involves the use of chemical treatments to improve the efficiency of water use in cooling processes, reducing our overall water consumption and impacts on nature.



Nature Conservation

Tandem Global to Reforest Portside

In 2025, we continued our collaboration with Tandem Global, conducting additional plantings of trees and flowers installation of new irrigation systems and continued tending to the existing trees as part of our dune and swale habitat at our Portside facility. This helps enhance local biodiversity and provide a habitat for wildlife. We will continue to deepen our partnership with Tandem Global to implement additional conservation initiatives in 2026 and beyond.

Operate Responsibly

Our Approach

Primary Energy's approach to governance and business ethics is grounded in our core values, which serve as the foundation for our policies and decision-making processes across our operations – with our team's health and safety at the forefront.



Health and Safety

The health and safety of our employees is our utmost priority. Our robust Health & Safety Policy outlines our commitment to providing a safe workplace free of recognized hazards, occupational injuries and illness, underscoring our motto: "If it cannot be done safely, it should not be done at all."

Primary Energy is committed to:

- Complying with or exceeding all health and safety laws and regulations, requirements and industry standards applicable to our activities
- Ensuring all personnel working on a Primary Energy location have the authority and responsibility to stop work without repercussions when an unsafe situation is recognized or suspected
- Identifying and mitigating health and safety hazards arising from our activities
- Ensuring that our staff understands that working safely is a condition of employment and that all workers are responsible for their own health and safety as well as the health and safety of those around them
- Ensuring the competency of our staff is maintained and providing our staff with training, knowledge and resources to achieve health and safety excellence
- Continually improving our safety programs by setting health and safety objectives and targets, and measuring and monitoring our performance through regular inspections, audits and investigation of all incidents
- Integrating health and safety into our business planning and decision-making
- Protecting the health and safety of our staff and the public

Employee and Contractor Training

Prior to completing any work at our facilities, all Primary Energy employees must complete training programs as required by the Occupational Safety and Health Administration (OSHA). Additionally, we require every contractor working onsite to complete a site-specific safety program tailored to the unique requirements and hazards of each facility. If any issues are identified, we work closely with our contractors' safety representatives to provide refresher training on those specific topics to address and prevent any incidents or non-compliance.

Incident Tracking and Reporting

We track and investigate all injuries, illnesses and near misses and share reports on any incidents with internal teams and onsite contractors. In 2025, we had one employee injury at the Cokenergy facility. The incident occurred during routine valve operation. A thorough investigation was conducted, and findings were shared across all facilities to reinforce safe work practices and ergonomic awareness. All other facilities remained injury-free throughout the year. For contracted labor specifically, we've only had one injury in nearly 15 years and continue to avoid any and all injuries.

In 2025, we celebrated the following milestones:

Eight

years injury-free at the North Lake facility

Seven

years injury-free at the Portside facility

Safe Work Observations

Team managers conduct regular safe work observations at all our plants to ensure that proper personal protective equipment (PPE) is being used, assess if any additional tools or safety measures are needed, and provide positive feedback when safe practices are followed. These observations follow a structured schedule, with a different team of two managers conducting an observation once a week. The team completes a checklist to highlight focus areas, such as lockout/tagout procedures, fall protection requirements, hearing protection usage and confined space and hot work permits.

Compliance Policies

Our comprehensive employee handbook serves as our primary resource for reinforcing our ethical principles across our operations. It outlines our code of conduct, setting clear expectations for employee behavior and maintaining compliance with local, federal, and state government agencies. We update the handbook regularly to ensure we remain in compliance with regulatory shifts and review all updates with our legal counsel. As we operate across multiple states, our handbook aligns with the most stringent of all applicable labor laws. In 2025, we expanded our whistleblower policy to include environmental and ESG-related topics, ensuring employees are aware of available channels to report concerns confidentially.

Our rigorous root cause failure analysis (RCFA) processes allow us to identify and address potential compliance issues proactively. These processes involve thorough investigations to determine the root causes of recurring issues, followed by the implementation of corrective actions and systematic changes to prevent recurrences. We are continuously improving our RCFA approach.

Data Security

We have evolving and robust data security controls and IT safeguards to protect sensitive data and prevent issues such as data breaches and cyberattacks. These measures include strict access controls, advanced encryption, network security, endpoint protection, data backup and recovery, continuous monitoring, security awareness training, and compliance with industry standards. These comprehensive controls ensure the integrity and confidentiality of information, safeguarding against cyber threats.

Building on the security enhancements introduced in 2024, we continued to strengthen the resilience of our systems throughout 2025. We expanded our zero-trust network access framework, extending segmentation across additional sites and systems to further isolate critical infrastructure and limit potential points of exposure. We also implemented automated baseline security configurations across our workstations and servers, allowing us to enforce consistent standards and quickly detect and correct configuration drift. In addition, we broadened our change-tracking capabilities to gain greater visibility into our environment, helping us identify and respond to changes that could affect security or reliability. These improvements continue to support reliable service delivery and employee productivity while safeguarding the integrity and confidentiality of our information.

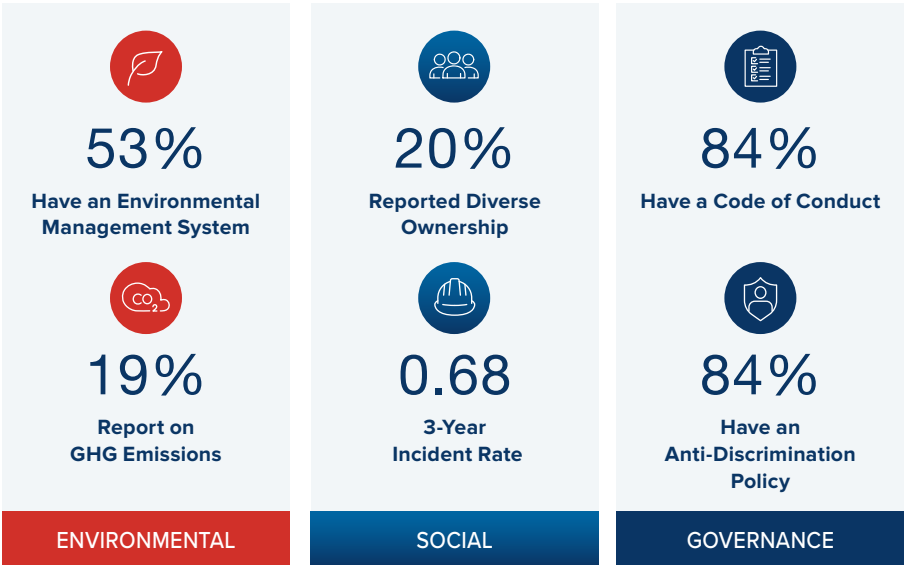
Supply Chain Engagement

Primary Energy is committed to working with suppliers and contractors that share our values for safety, environmental responsibility, ethical business practices and diversity. We share comprehensive standard terms and conditions with all vendors we work with, encompassing various compliance requirements and sustainability considerations to ensure alignment with our values and expectations.

For vendors and contractors who perform work at our sites, we leverage an external ISN platform to evaluate their safety programs, performance records and other relevant metrics to ensure compliance with our policies. In 2024, we began using this platform to also request other sustainability-related information from our contractors, such as environmental metrics and details on supplier diversity. This further enhances our ability to evaluate and promote responsible practices within our supply chain. The metrics provide valuable insight into the maturity of our suppliers’ sustainability programs and help identify opportunities for future engagement and continuous improvement.

In 2025, we expanded our supplier engagement efforts, including tracking minority-owned business participation through our procurement process. This enhanced visibility supports more informed sourcing decisions while encouraging a diverse, responsible and resilient supply chain aligned with our long-term sustainability objectives.

OUR SUPPLY CHAIN BY THE NUMBERS



Membership in Trade Organizations

To stay informed about best practices, regulatory developments and emerging trends in the energy and industrial sector, we actively participate in prominent industry organizations such as:

- **American Iron and Steel Institute (AISI):** Primary Energy CEO Mo Klefeker serves as an associate board member for AISI, which represents the interests of the North American steel industry.
- **Heat is Power (HIP):** As an active member of HIP, which comprises companies that utilize waste heat to produce steam power, we stay informed about industry trends, best practices and regulatory developments related to waste heat recovery and power generation.
- **Association for Iron and Steel Technology (AIST):** Our employees regularly attend local Midwest chapter events and the annual AISTech conference. The organization aims to advance the technical development, production, processing and application of iron and steel in the U.S.
- **Power Users Group (PUG):** We actively engage with PUG, an organization comprising sub-user groups in the power industry. PUG facilitates open forums, conferences and technological resources for power generation owners and operators to share information on facility operations and equipment maintenance.
- **Dry Scrubber User Association (DSUA):** We are a member of DSUA, a nonprofit organization whose mission is to facilitate the exchange of valuable knowledge among owners, operators and suppliers of dry scrubber technology used for flue gas treatment for power generation and industrial applications.

Support Our Communities

Our Approach

Our motto, “Our primary energy is our team,” underscores our dedication to fostering a positive, engaging and inclusive workplace where everyone can thrive. Initiatives like our workplace positivity program, professional development opportunities and community engagement are central to our approach, ensuring that our employees feel valued and integral to our company’s success.

Commitment to Diversity

Primary Energy is an equal opportunity employer, and we prioritize fostering a team-oriented culture where everybody feels like they belong. This not only supports our team members but also drives value creation through the contributions of diverse perspectives. Our commitment to diversity ensures that all team members and new talent are welcomed, respected and supported, regardless of gender, race, ethnicity, sexual orientation, religion or other identifiers. We aim to continuously empower diverse voices to fulfill our mission of powering prosperity for all.

28

total employees as
of year-end 2025

85%

employee health & wellness
program participation in 2025



Employee Experience

Workplace Positivity & Engagement Program

Our workplace positivity and engagement program is designed to promote team building, enhance our work environment and ensure that positivity extends into our employees' lives, contributing to their overall job satisfaction and well-being. One aspect of this program is our quarterly five-minute instructive "Sparks" videos, which cover a variety of topics such as tips on handling different workplace situations and approaching difficult conversations. They aim to facilitate transparent communication between managers and employees. We also hold all-hands meetings twice per year, which serve as a platform for discussing our company's goals, core values and other important updates. These meetings are designed to be engaging and interactive, ensuring that every employee feels included and informed.

Recognition & Appreciation

We acknowledge and celebrate the hard work and dedication of our employees through our recognition and rewards program. This includes activities such as team-building, Q&A sessions, and "Fun Fact Fridays," which come with rewards like candy bars and gift cards, as well as advocating for spot bonuses to recognize exceptional performance. Additionally, we celebrate employees on their birthdays, work anniversaries and other life events. Managers maintain a list of their colleagues' "favorite things," allowing them to customize recognitions and celebrations to their direct reports' hobbies and interests.

Every year on Employee Appreciation Day, we organize a baseball game to show our gratitude to our workforce. This is an opportunity for our leadership team to express their thanks and for colleagues to enjoy a fun outing with the team.

Health and Wellness

We encourage and promote a healthy lifestyle among our employees by offering annual voluntary health and wellness checks where employees can receive a comprehensive medical report on different aspects of their physical health. Employees can choose to share this report with their doctor. Health and wellness program participation increased from 80% in 2024 to 85% in 2025, reflecting continued employee engagement and the company's commitment to workforce wellbeing.

We also host challenges to encourage physical activity and increased energy, such as walking more steps or getting more sleep by disconnecting from phones before bed. Additionally, we provide ergonomic workspaces for day-to-day job responsibilities and incentives for flu shots, ensuring that employees are supported in maintaining their health throughout the year.



Primary Energy employees collecting 2025 Walking Challenge Trophy.

Benefits

As part of our commitment to our employees and their well-being, we provide a variety of benefit plans to help them maintain a high quality of life. We continuously review our benefits offerings to ensure they remain competitive. Our benefits include:

- Medical, Dental, and Vision Insurance
- Basic Life, Accidental Death and Dismemberment Insurance
- Voluntary Supplemental Term Life Insurance
- Short- and Long-Term Disability Insurance
- Accident and Critical Illness Insurance
- Employee Assistance Program
- Health Reimbursement Accounts, Flexible Spending Accounts, and a 401(k) Retirement Plan

Talent Attraction, Retention and Development

Attracting, retaining and developing our team is critical to Primary Energy's continued success. We continuously refine our recruiting and employee engagement strategies to ensure we remain an employer of choice.

In 2024, we began our internship program to attract and cultivate new talent and further career development opportunities for recent college graduates. The internship program welcomed its second intern in 2025.

“My internship at Primary Energy gave me meaningful, hands-on experience while allowing me to work alongside professionals who genuinely invested in my growth. I felt welcomed from my first day, and the support I received made this an experience I’ll never forget.”

— Joshua Martin, 2025 Summer Intern, from Maine Maritime Academy (Power Engineering Technology Major)

We provide internal opportunities for our employees to advance their careers, including promotions and allowing employees to apply for other positions within the organization. For example, an employee who started as a facility assistant at the Portside plant was able to transition to various roles including EH&S, Procurement and O&M.

- We continued to obtain the AON salary assessment survey to ensure fair and competitive wages across all areas. We also conduct regular performance reviews and encourage career development conversations between managers and direct reports.
- We offer education assistance for employees interested in pursuing further education and training outside of the workplace. This not only benefits their personal development and career advancement but also enhances their contributions to the company.

Collaborating with Steel Mill Partners

While Primary Energy's direct employee footprint is small, our engagements go beyond our immediate team, extending to steel mill employees at our sites. Our equipment is located within steel mills, and we collaborate with local steel mill union employees from USW Locals 1010, 1011 and 6103 to operate and maintain this equipment. We make efforts to build strong relationships with these individuals and local unions, running team-building events to cultivate teamwork and boost morale.

Building the Next Generation of Clean Energy Leaders

In 2025, Primary Energy continued to grow its internship program in partnership with Maine Maritime Academy's Stationary Plant Program, which prepares students for careers in power engineering technology and operations. The program reflects our commitment to developing future industry leaders and expanding awareness of combined heat and power and waste heat recovery as meaningful, sustainable career paths.



Through the program, we host paid interns who are embedded into our operations just like any new employee. After completing safety orientation and plant familiarization, interns begin by tracing piping, wiring, and equipment in the field alongside a mentor to build a working understanding of how our facilities operate. From there, they are gradually integrated into operations and maintenance functions including planning, maintenance supervision, directing operations, and evaluating water chemistry. This enables interns to gain a broad array of hands-on experience that is difficult to find in larger industrial settings where employees tend to specialize early in their careers.

Primary Energy participates in Maine Maritime Academy's annual career fair to identify candidates and structures each internship to align with the Academy's academic requirements. Interns' complete weekly activity reports, a comprehensive technical report on plant systems and operations, and receive a formal performance evaluation at the end of their placement. These requirements support the hours students need to qualify for a State of Maine stationary plant license, giving them a credential that translates directly into career readiness.

The program serves a dual purpose: it gives students exposure to the niche but growing field of industrial energy recycling, and it builds a pipeline of skilled talent for Primary Energy and the broader clean energy workforce. We attend Maine Maritime's career fair annually and plan to continue expanding the program in the years ahead.

Community Engagement and Charitable Activities

We are committed to active involvement in the communities in which we operate. We organize employee-driven initiatives, such as food, clothing and school supply drives, which are distributed to local schools and organizations serving those in need. We also offer an annual volunteer day to all employees where they can engage in a charitable activity of their choice.

Some of our community and charitable activities in 2025 included:

- We continued to partner with We Care From the Heart, an Indiana nonprofit organization that operates food pantries and drives to support the local community. We provided coats, food and toys for the organization to distribute, as well as essential items for their Summer Block Party that supplies clothes and health screenings to unhoused individuals.
- We sponsored the Gary Air Show, a two-day aviation event in Gary, Indiana. Funds from the event support worthy causes such as a local food bank.
- We helped assemble survival kits for unhoused individuals at Hesed House in Aurora, Illinois.
- We participated in Feed My Starving Children in Naperville, IL packing meals for children in need, with approximately 15% of our employees volunteering at the event.

~100

local families supported by Primary Energy's supplies and donations across community events in 2025

~300

recipients received support from the Summer Block Party

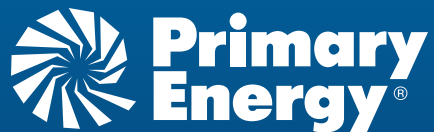


Primary Energy was a sponsor of the Gary Air Show in 2025.



Match Best Practices in Sustainability

Thank you for your interest in Primary Energy's annual Sustainability Report. Guided by the sustainability standards and principles set forth by our ownership group, SDCL, this report marks an important milestone in our commitment to transparency and continuous improvement. As we look ahead, we will continue to prioritize environmental stewardship, social responsibility and ethical governance across all facets of our operations. We look forward to working alongside all stakeholders to build a brighter, more responsible energy future.



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