

TECHNICAL COMPETENCY POLICY

Biogen (UK) Ltd is committed to ensuring that all personnel are demonstrably competent to carry out their roles safely, effectively, and in compliance with regulatory, environmental, and operational requirements. This policy supports the organisation's application of the Energy & Utility Skills Competence Management System (CMS) and reinforces our commitment to maintaining technical competence across all anaerobic digestion operations.

This policy applies to all employees, agency workers and contractors and third parties working on behalf of Biogen across all operational and support functions.

Biogen has implemented a structured Competency Management System (CMS) to ensure compliance with environmental permits and regulatory requirements, support process safety and environmental protection and provide assurance to regulators and stakeholders of technical competence. The CMS will ensure that competence is defined, assessed, verified, maintained and reassessed.

All roles shall have defined competency profiles, which include core competencies, technical competencies, safety-critical competencies and environmental competencies.

Competency shall be assessed using structured and documented methods, including workplace observation, practical assessment, knowledge testing, review of qualifications and experience and scenario-based assessments where applicable. Assessment criteria shall be defined and standardised to ensure consistency.

Competence for safety-critical and environmentally critical roles shall be subject to independent verification. Assessors must be competent and authorised to conduct assessments. Periodic internal audits shall be undertaken to validate competency decisions

Competence is not static and shall be actively managed through routine reassessment and trigger based reassessment following incidents/near misses, changes in plant, process or procedure, audit findings, extended absence from role and regulatory or permit changes.

Where competency gaps are identified appropriate training, coaching, or development shall be provided. Training shall support competence but will not be considered evidence of competence alone. This aligns with Biogen's commitment to continuous improvement and employee development.

Objective evidence of competence shall be recorded within the CMS, maintained in a controlled and auditable format and available for internal and external audit.

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Senior Management will provide leadership, governance and resources for CMS and will ensure alignment with regulatory and business requirements. Line Managers will ensure personnel are competent for their roles, Conduct or arrange competency assessments and authorise competence sign-off. Competency Assessors will conduct structured assessments, maintain assessor competence and provide objective evaluation. Employees will maintain their own competence and participate in assessments and development. The Compliance Team will provide an oversight of CMS implementation and monitor compliance and audit effectiveness

All contractors shall be assessed for competence prior to undertaking work, provide evidence of qualifications and experience and be subject to site-specific competency requirements where applicable. Competency expectations shall be proportionate to the risks associated with their activities.

Competence underpins Biogen's ability to comply with environmental permit conditions, manage process safety risks in AD operations and respond effectively to emergencies. The CMS shall support the control of these critical risks.

Biogen will regularly audit the CMS (internal and external), review competency performance and trends, update competency requirements in response to regulatory changes, operational changes and audit findings. Continuous improvement is embedded within the Integrated Management System.

This policy shall be reviewed at least annually and/or following significant organisational, operational, or regulatory changes

Signed  Dated 1st June 26
Adam Feneley
Chief Executive Officer, Biogen (UK) Ltd

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