



### Anti-slavery statement

Infinis Energy Limited published its [first anti-slavery statement](#) in September 2016 in respect of the period 1 October 2015 to 31 March 2016 (inclusive). The statement covered the activities of both Infinis Energy Limited and all of its UK subsidiaries, including Infinis Energy Services Limited (**IES**).

Since that statement was published, the landfill gas division has been sold to 3i Infrastructure plc (the “Sale”). As part of the completion of that Sale in December 2016, the Infinis group of companies underwent a major restructuring.

As Infinis Energy Limited is no longer part of the Infinis group of companies which operate the landfill gas business, references in this statement to **we, us, Infinis and the Infinis group** now relate to Infinis Energy Management Limited which oversees group governance on behalf of itself, Infinis Energy Group Holdings Limited and all of the UK subsidiaries of Infinis Energy Group Holdings Limited including IES.

As the second anti-slavery statement published by Infinis in accordance with the Modern Slavery Act 2015, this statement sets out the steps which Infinis has taken between 1 April 2016 and 31 March 2017 (inclusive) to build on the robust foundation established by the business in the previous financial year and to further develop its ongoing work in relation to eradicating the risk of modern slavery from its business and supply chains.

Infinis continues to conduct all of its business in an honest and ethical manner. Corporate social responsibility, including ensuring that we only purchase from responsible supply chains, remains a cornerstone of our business and we maintain our zero-tolerance approach to slavery and human trafficking (**modern slavery**).

#### Infinis' structure, business and supply chains

Following the Sale, Infinis remains the largest generator of electricity from landfill gas in the UK, operating 121 sites, and a leading generator of renewable power.

IES continues to manage the majority of the Infinis group's procurement activities, and IES therefore remains the starting point of most of the Infinis group's supply chains.

Over the last 12 months, we have worked with over 600 direct suppliers of goods and services, all of whom have been risk assessed. All new suppliers who we have entered into supply contracts with since 1 April 2016 have been through our detailed due diligence processes.

#### Written policies and procedures

Following the Sale, we took the opportunity to review and re-adopt as appropriate our written policies and procedures including our anti-slavery policy, our whistleblowing policy and our procurement policies and procedures. We have also reviewed our anti-slavery policy as part of our annual policy review and updated this as required.



### Risk assessment

The principal goods and services procured by the business continue to be almost exclusively supplied by the developed economies of Europe or North America and little of our supply chain spend is outside of these economies.

We reviewed the framework of last year's risk assessment and refined it to improve the quality of both the risk assessment itself and the data used to complete it. This included:

- auditing the information used to correct errors and remove inconsistencies
- reclassifying the construction sector as a high risk sector
- removing annual spend as a criteria as this is not considered to be a key criteria affecting the risk of modern slavery in our supply chain
- updating the scoring criteria used for the supplier's geographical location to reflect the updated Global Slavery index
- taking into account (in relation to high risk business sectors only) the wider geographical location of our suppliers' wider business

We completed the risk assessment again on all our direct suppliers with whom we traded last year, and we are very pleased to report that again, the majority of our suppliers were identified as low risk with no high risk suppliers.

As a result of the refinements we have made to the risk assessment, we consider this to be a more accurate reflection of the modern slavery risks posed by our suppliers.

Of the suppliers who were categorised as medium risk and who continue to supply Infinis' landfill gas business, we identified a small number who operate in high risk business sectors and locations but who had published very limited information about the steps they had taken to mitigate the risks of operating in those business sectors and locations. We carried out further due diligence in respect of those suppliers, including, where necessary, speaking to them directly about their operations. As a result of our due diligence, we are now comfortable that these suppliers have appropriate modern slavery policies and procedures in place and we are satisfied that no further action is required at this time.

We have identified several other medium risk suppliers on whom we will carry out additional due diligence in the coming year.

### Due diligence processes

- New suppliers

Our new process for onboarding new suppliers, which includes specific modern slavery due diligence processes, has now been rolled out and was applied to all new suppliers that were engaged from 1 April 2016. We will continue to apply this process to all new suppliers next year.

We will also review this new process next year to ensure that we are satisfied that we have sufficiently robust procedures for identifying medium and high risk suppliers and ensuring that the appropriate follow up is completed before suppliers are onboarded.

- Existing suppliers



We have carried out additional due diligence on some of our medium risk suppliers and we have also rolled out an enhancement of our CIPS procurement system which assists us to monitor the corporate social responsibility and anti-slavery activities of our strategic suppliers.

In general, we believe that the most proportionate and effective way of carrying out due diligence on existing suppliers will be to include our specific modern slavery due diligence processes into our contract renewal process.

#### Supply contracts

The majority of the new supply contracts entered into last year included specific contractual obligations requiring our suppliers to take steps to ensure that there is no modern slavery in their own business or their supply chains.

As contracts with existing suppliers come up for renewal, we will seek to incorporate appropriate modern slavery provisions in those new contracts.

#### Staff training and awareness

All of our procurement staff have received anti-slavery training over the last 12 months and we are now developing a programme for relevant non-procurement staff.

#### Progress on last year's objectives

In last year's statement, we identified four areas that we wanted to enhance and develop during 2016/2017:

- enhancing and extending the existing system in place to monitor the corporate social responsibility of our strategic suppliers
- carrying out more in-depth due diligence on our medium risk suppliers
- developing our risk assessment criteria
- mapping out the second and subsequent tiers of our supply chain

As detailed above, we have been successful in progressing the first three of the objectives that we set ourselves.

The changes to the business meant that we refocused our efforts in relation to modern slavery and that we concentrated on ensuring that our policies and procedures were appropriate for the new business. Our work on mapping the second tiers of our supply chain therefore remains in progress.

#### Our plans for the next financial year

We are proud of the progress we have made this year, particularly in light of the major changes to the business. We are committed to continuing to improve and develop our work on modern slavery and we have identified the following as a starting point for next year's work:



- mapping the second tier of our supply chain
- carrying out additional due diligence on more medium risk suppliers
- reviewing our new supplier set-up process for possible improvements
- continuing our programme of due diligence on existing suppliers through the contract renewal process
- rolling out additional training to staff.

**This statement has been approved by the board of directors of Infinis Energy Management Limited.**

**Signed:**

**Name:** Shane Pickering  
**Position:** Managing Director  
**Date:** 7 September 2017