



Anti-slavery statement

This is the third anti-slavery statement published in relation to the activities of the Infinis group of companies in accordance with the Modern Slavery Act 2015. In this statement, references to **we, us, Infinis** and **the Infinis group** relate to Infinis Energy Management Limited which oversees group governance on behalf of itself, its holding company, Infinis Energy Group Holdings Limited and all of the subsidiaries of Infinis Energy Group Holdings Limited, including Infinis Energy Services Limited (**IES**).

This statement sets out the further steps that Infinis has taken between 1 April 2017 and 31 March 2018 (inclusive) (**FY18**) to build on the progress made 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. Details of the steps that Infinis has taken in previous financial years can be found in its [first](#) and [second](#) anti-slavery statements.

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

Infinis remains the largest generator of electricity from landfill gas in the UK (operating 121 landfill gas sites during FY18) and a leading generator of renewable power.

In April 2018 Infinis announced its acquisition of Alkane Energy (**Alkane**) (**the Acquisition**), an independent power generator from both coal mine methane (**CMM**) and reserve power operations. The Acquisition completed outside of the statement period and is therefore not represented in this statement.

During FY18, arrangements with our suppliers did not change significantly to those reported in our [second](#) anti-slavery statement. We have worked with over 600 direct suppliers of goods and services, all of whom have been subject to an annual risk assessment. All new suppliers with whom we have entered supply contracts since 1 April 2016 have been through our detailed due diligence processes, as set out below.

Written policies and procedures

Our anti-slavery policy reflects our commitment to acting ethically and with integrity across our business relationships throughout our supply chains. We reviewed this policy in FY18 as part of our annual review and were satisfied that it accurately reflects our current processes and procedures.

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. Little of our supply chain spend is outside of these economies.



We reviewed the framework of last year's risk assessment and implemented minor changes in order to update the current supplier list, the length of supplier relationship and the scoring criteria to reflect the updated Global Slavery Index. We are satisfied that this improved our ability to analyse risk and that the assessment was robust for use in FY18.

In last year's statement we reported that we had started to take into account (in relation to high risk business sectors only) the wider geographical location of our suppliers' wider business and we continued this in our FY18 assessment.

We completed the risk assessment again on all 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.

Next year we will extend the risk assessment to Alkane suppliers that have been onboarded following the Acquisition.

Due diligence processes

- New suppliers

Our process for onboarding new suppliers continues to be applied, including the issue of an updated due diligence questionnaire covering more detail in relation to anti-slavery risk management. We reviewed the new supplier onboarding process during FY18 and concluded that, in light of the training provided to relevant Infinis staff responsible for onboarding suppliers, no amendment to the process is required at this stage.

We will keep this under review and continue to apply this process to all new suppliers next year, including the issue of our CSR Questionnaire to all Alkane suppliers that are onboarded.

- Existing suppliers

The CIPS Sustainability Index continues to provide us with a useful due diligence tool in assessing transparency in relation to the corporate social responsibility and anti-slavery activities of our strategic suppliers.

In our [second](#) anti-slavery statement we reported that we had identified certain medium risk suppliers on whom we intended to carry out additional due diligence during FY18. This has comprised online research into supplier risk management in relation to modern slavery along with direct due diligence through the issue of questionnaires to certain identified medium risk suppliers. We are pleased to report that our online due diligence is substantially complete and direct questionnaires have also been issued to all relevant suppliers.

Based on the information obtained to date, no issues have been identified and we are comfortable that the medium risk suppliers identified for further due diligence have appropriate modern slavery policies and procedures in place.

We have also started to roll out our due diligence questionnaire to existing suppliers on contract renewal and we intend to consolidate this approach in parallel with the Alkane procurement



integration during FY19. We believe this to be the most proportionate and effective way of conducting due diligence on our existing suppliers.

The due diligence carried out since our second anti-slavery statement was published has allowed us to make good progress in mapping the second tier of our supply chain in relation to our medium risk suppliers operating in high risk business sectors. The results to date show that the majority of such second tier suppliers are located predominantly in low risk European countries with the exception of a limited number of global multi-national businesses whose supply chain is also truly global. Based on the information available to us, we believe that this second tier 'global' supply chain is principally operating in the consumables, textiles and petrochemical industries. As a result of this we intend to review the risk rating applied to the direct supplier that such second tier suppliers relate to in order to ensure that it appropriately reflects the fact that the second tier brings additional risk factors (by virtue of their global operations and the business sectors operated in). We consider that the information and understanding gleaned from this exercise combined with our proportionate due diligence into the risk mitigation measures adopted by those organisations provides us with further assurance in respect of the transparency of our supply chain.

Supply contracts

The majority of the new supply contracts entered into in FY18 continue to include 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 continue to seek to incorporate appropriate modern slavery provisions in those new contracts. We have refined the relevant contract clauses used in our standard form contracts to ensure that they are reflective of our high expectations.

Staff training and awareness

All of our procurement staff have again received anti-slavery training over the last 12 months and we delivered training to the wider business in December 2017 as intended.

Next year we plan to roll out further training to maintain awareness and to ensure that staff that have joined us following the Acquisition have received relevant training.

Progress on last year's objectives

In last year's statement, we identified four areas that we wanted to enhance and develop during FY18:

- 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
- Rolling out additional training to staff.

We are proud of our continued improvements and developments in respect of our anti-slavery practices and feel that we have been successful in progressing the objectives we set in last year's statement



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Our plans for the next financial year

Next year our efforts will be concentrated on the integration of the Alkane business into our anti-slavery risk management programme including:

- the integration of Alkane suppliers into the IES procurement process including the roll out of our due diligence questionnaire to all such suppliers to be onboarded
- the inclusion of Alkane suppliers in our risk assessment to ensure we have a cohesive view of our supply chain when considering risk
- the continued mapping of our second tier supply chain so as to incorporate those suppliers who have not yet responded and any onboarded Alkane suppliers
- further staff training to maintain awareness and to promote awareness to new staff following the Acquisition

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

Signed:

Name:

Shane Pickering

Position:

Chief Executive Officer

Date:

1 October 2018