

## Anti-slavery statement FY21

This is the sixth anti-slavery statement published in relation to the activities of the Infinis group of companies in accordance with section 54 of the Modern Slavery Act 2015 (the “**Act**”). It sets out the steps that the Infinis group has taken in the period 1 April 2020 to 31 March 2021 (inclusive)(“**FY21**”) to build on the progress made in previous financial years and to further develop its ongoing work in relation to eradicating the risk of modern slavery and human trafficking (**modern slavery**) from its business and supply chains.

In this statement, references to **we, us, Infinis** and **the Infinis group** relate to each of the Infinis group companies that are listed in our Annual Report. Our Annual Report is available on our website: <https://www.infinis.com/knowledge-centre>

In FY21 two Infinis group companies, Infinis Energy Management Limited and its subsidiary, Infinis Limited, satisfied the criteria set out in section 54 of the Act and are therefore required under the Act to publish an anti-slavery statement for the FY21 period. Notwithstanding this, the steps that are described in this statement apply equally to all Infinis group companies.

Details of the steps that Infinis has taken in previous financial years can be found in its previous anti-slavery statements which were published for previous financial years ending 31 March. These are also available on our website: <https://www.infinis.com/knowledge-centre>

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 modern slavery.

### Infinis' structure, business and supply chains

Infinis is the UK's leading generator of low carbon power from captured methane. It is one of the few companies in the UK already delivering a positive impact on climate change through the capture of greenhouse gas and use of that resource to generate low carbon electricity.

In FY21 the Infinis group operated three business divisions from sites across the UK: captured landfill methane (**CLM**); captured mineral methane (**CMM**); and power response (**PR**). In April 2021 Infinis successfully constructed its first solar energy park and further investment in the generation of electricity from solar power is planned in FY22 onwards.

Infinis business divisions operate under an ultimate parent company, Infinis Energy Group Holdings Limited and its subsidiary, Infinis Energy Management Limited, which oversees group governance.

Infinis Limited, Alkane Energy Limited and Infinis Alternative Energies Limited together with their subsidiaries (as applicable), operate the CLM, CMM and PR divisions, respectively. Solar development projects are developed and constructed by Infinis Solar Developments Limited and once completed, are operated by Infinis Solar Limited. In FY22 Infinis intends to commence developing battery storage projects which will be carried out by Infinis Energy Storage Limited.

During FY21 the Infinis group continued to be the largest generator of electricity from CLM in the UK with 240MW of installed CLM capacity across 103 sites. It also remained the largest CMM operator in the UK with 42MW of installed capacity across 16 sites. The PR division generates power from 30 sites using mains natural gas or liquefied fuel with 183MW of installed capacity and Infinis' first solar energy

park has an installed capacity of 7MW. In total across all divisions in FY21 Infinis exported 1,404GWh of power.

The nature of the Infinis supply chain and arrangements with suppliers has not changed significantly compared to the position reported in the previous statement. A number of suppliers continue to provide goods and services to our CLM, CMM and PR business divisions. Where synergies exist, the same suppliers provide goods and services to solar development projects, where they don't then a number of industry specific new suppliers have been onboarded to supply these projects.

In FY21 Infinis worked with over 500 direct suppliers of goods and services which reflected a slight consolidation and reduction compared to the previous year. All suppliers were subject to the annual risk assessment process where their use was ongoing. Longstanding relationships exist with the majority of suppliers and a detailed due diligence process continues to be applied to all new suppliers. Our due diligence process was reviewed in FY21 and updated to reflect a more risk based approach (as described below).

In FY21 the principal goods and services procured by the business continued to be almost exclusively supplied by the developed economies of Europe or North America. A small element of the supply chain spend is outside of these economies. Our suppliers largely operate in the engineering (including industrial parts and component manufacturing and servicing), construction, consumables and professional services sectors.

The second tier of our supply chain remains predominantly within the UK and Europe. Our suppliers who have a global supply chain remain predominantly multinational businesses and operate in a range of business sectors including industrial parts and component manufacturing and servicing, engineering services, consumables manufacturing and supply, construction (including raw materials), textiles, IT/software, electronics and professional services.

The solar development supply chain has been identified and deemed to be at higher risk of modern slavery than other areas of our business. This is due to the location of certain solar industry supply chains and concerns raised from within the industry alleging human rights violations. It is intended that additional steps will be introduced to improve transparency of the solar development project supply chain including:

- additional due diligence on suppliers;
- seeking specific commitments from suppliers during the tender process that materials supplied for our projects are sourced from a factory that respects human rights; and
- engagement with solar industry supply chain transparency initiatives including signing the Solar Energy UK statement condemning all abuse of human rights and supporting the development of an industry led traceability protocol.

#### 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. This policy was reviewed in FY21 and we were satisfied that it accurately reflects our current processes and procedures. Our anti slavery policy is communicated to our suppliers through our supplier onboarding process and in supplier management meetings in the context of our regulatory awareness initiative. The policy is communicated to our staff through staff training and internal awareness initiatives (as described further below).

Further information regarding our approach to sustainability, including the protection of human rights can be found in our sustainability policy which is available on our website: <https://www.infinis.com/knowledge-centre>

### Risk assessment

We continue to build on the framework of risk assessment of our supply base carried out in previous years. This approach helps prioritise and target the delivery of our supplier and risk management initiatives with regard to modern slavery and corporate social responsibility matters. Our risk assessment was updated in FY21 in order to include all direct suppliers with whom we traded in the FY21 period. As in previous years, our risk assessment considers the length of our relationship with our suppliers, the business sectors and geographical locations in which they operate (using the Walk Free Foundation Global Slavery Index), any known issues identified by our Procurement Team in the course of the year (of which there are none other than in relation to solar panel supply chain mentioned above) and any measures that our suppliers have implemented to tackle modern slavery in their own supply chains.

We considered the introduction of automated data reporting to inform and improve our annual risk assessment and concluded that the standardization of data collation from existing systems combined with the data generated by our new onboarding process would achieve the same objective. We are satisfied that this continues to provide a valuable tool to inform our assessment of and improve our understanding of our supply base.

Our FY21 risk assessment identified one high risk supplier, which supplied goods and services to our solar development projects. We have not identified any non-conformance to date, however our direct engagement with the supplier to obtain further assurances with regard to their own processes and procedures and zero tolerance approach to modern slavery will continue into FY22 along with our strong encouragement of their existing involvement in industry body initiatives to improve solar industry supply chain transparency.

### Due diligence processes

#### New suppliers

In FY21 we reviewed our process for onboarding new suppliers. The process continues to utilise a comprehensive due diligence questionnaire which focuses on details of both the supplier and their own supply chain. The questionnaire has been redesigned to achieve a more proportionate, risk based and user friendly approach which is aimed to ensure that we receive the highest quality of information possible. This process is supplemented by the requirement that our larger, predominantly strategic new suppliers attain Achilles UVBD accreditation which provides an independent due diligence risk management platform including audit of accredited suppliers. This dual approach ensures that we continue to apply a robust due diligence process to all new suppliers and helps us maintain and further improve transparency and understanding of our wider supply chain.

#### Existing suppliers

We continue to take the opportunity on contract renewals to require our suppliers to attain Achilles UVBD accreditation as appropriate. We have not extended our new onboarding process to existing suppliers but we intend to conduct a wider supply chain sustainability review, which will include a human rights risk assessment of our key suppliers. We believe these initiatives provide a proportionate

and effective way of ensuring our due diligence on our existing suppliers remains current and that our suppliers have appropriate policies and procedures in place relating to modern slavery risks.

### Supply contracts and KPIs

In FY21 we reviewed our contracts process to accommodate a more risk based approach to contract review. The new contracts process operates alongside the new onboarding process and encourages departmental engagement in the assessment and mitigation of contract and supply chain risk including in relation to modern slavery. Our standard form supply contract has been reviewed and simplified so as to improve supplier engagement under it and includes 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. The majority of the new supply contracts entered into in FY21 have continued to include these or appropriate equivalent provisions. As contracts with existing suppliers come up for renewal, we continue to seek to incorporate appropriate modern slavery provisions in those new contracts.

We reconsidered the need for measurable and proportionate KPIs to encourage proactive engagement by our direct suppliers in our risk management processes and the timely response to due diligence requests. Both the new onboarding process and the Achilles UVBD platform implement a scoring system based on risk which will assist with this.

We intend to review our Supplier KPIs in higher risk business sectors to ensure that they do not drive pressures which may exacerbate the risk of modern slavery.

### Supplier awareness

In FY21 we continued to roll out our ethical awareness initiative aimed at our suppliers which involved the inclusion of modern slavery awareness briefings in contract review sessions held through the year with our suppliers. The redesigned supplier onboarding process also aims to improve supplier engagement in risk management and mitigation and so is expected to further improve supplier awareness and the prevention of modern slavery.

### Staff training and awareness

The design and roll out of the new supplier onboarding process presented the opportunity to further develop understanding within the Procurement team and wider business of modern slavery risks. New staff continue to receive anti-slavery training as part of their induction process.

Since our last statement was published, we have also begun to roll out the previously planned ethical awareness campaign which includes the communication of key messages to staff via company devices to reinforce awareness of the impact and warning signs of modern slavery and related issues. This initiative will continue through FY22.

### Progress on last year's objectives

In last year's statement we confirmed that our efforts in FY21 would be concentrated on reinforcing staff awareness of modern slavery issues and fully reviewing and implementing a revised end to end supplier onboarding process to further improve both our robust due diligence process and supplier awareness so as to encourage the efforts of our suppliers in ensuring that there is no modern slavery in their supply chains. We highlighted the following planned actions:

- the introduction of automated data reporting to inform and improve our annual risk assessment
- the review and roll out of an improved new supplier onboarding process to further improve due diligence and the prioritisation of other risk management initiatives
- roll out of our internal ethical awareness initiative to maintain staff awareness
- review and update of conclusions from our FY20 supply chain mapping exercise to maintain transparency and understanding of our wider supply chain

We have explained in the previous sections of this statement how the above actions have been implemented.

#### Our plans for the next financial year

Next year we intend to concentrate our efforts on further improving supply chain transparency by utilising our redesigned supplier onboarding process and the valuable information that it provides. We intend to implement the following actions:

- Identification of opportunities for further participation in solar industry supply chain transparency initiatives
- Performance of a supply chain sustainability review including a human rights risk assessment of key suppliers to supplement our existing annual modern slavery risk assessment
- Review of supplier KPIs in higher risk business sectors to ensure that they do not drive pressures which may exacerbate the risk of modern slavery.

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



**Shane Pickering, Chief Executive Officer**

**29 September 2021**