

## Anti-slavery statement FY22

This is the seventh 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 2021 to 31 March 2022 (inclusive)(“**FY22**”) 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 FY22 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 FY22 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. Infinis is committed to generating a low carbon future and is already delivering a positive impact on climate change.

In FY22 the Infinis group operated four business divisions from sites across the UK: captured landfill methane (**CLM**); captured mineral methane (**CMM**); power response (**PR**); and solar PV (**Solar**). Infinis is also developing battery storage projects with the first projects expected to commence construction during FY23.

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. Infinis Solar Holdings Limited is the parent company of the Solar division whereas solar development projects are developed and constructed by its subsidiary companies, Infinis Solar Developments Limited and Infinis Solar Limited. The latter company also operates the solar projects once construction is complete. The development of battery storage projects will be carried out by Infinis Energy Storage Limited and its subsidiaries.

During FY22 the Infinis group continued to be the largest generator of electricity from CLM in the UK with 240MW of installed CLM capacity across 100 sites. It also operates 42MW of installed CMM capacity across 16 sites in the UK. The PR division generates power from 29 sites using mains natural

gas or liquefied fuel with 171MW of installed capacity and Infinis' first solar energy park has an installed capacity of 7MW.

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 and battery storage development projects; where they don't then a number of industry specific new suppliers have been onboarded to supply these projects.

The number of direct suppliers of goods and services to Infinis remains in the region of 500. Longstanding relationships exist with the majority of suppliers and due diligence via the new supplier onboarding process, which was introduced following a review in FY21, continues to be applied to all new suppliers.

In FY22 the principal goods and services procured by the business continued to be almost exclusively supplied by the developed economies of Europe or North America. As solar and battery storage development activities increase the proportion of the supply chain spend outside of these economies is expected to increase but in FY22 this proportion remained small. 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 and battery storage supply chains have 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 and battery industry supply chains and concerns raised from within the solar industry alleging human rights violations. Additional steps have been introduced to improve transparency of the solar and battery storage development project supply chains 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 FY22 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

In FY22 we considered the nature of our business and supply chain and new suppliers onboarded in the course of the year and, taking into account our recruitment procedures, the measures introduced by the new supplier onboarding process and additional measures adopted in relation to the solar and battery supply chains, we concluded that the risk of modern slavery within our business and arising from our supply chain had not changed significantly compared to FY21. To that end, we consider the risk arising within our business and from our supply chain to generally be low. The risk arising in relation to solar and battery storage supply chains is considered higher, as described above, but we continue to obtain further assurances with regard to supplier processes and procedures in relation to any such suppliers that are considered higher risk. Our zero tolerance approach to modern slavery will continue into FY23 along with our aim to encourage suppliers to our solar division to be involved in industry body initiatives to improve supply chain transparency.

### Due diligence processes

#### New suppliers

We continue to apply the updated process for onboarding new suppliers which we reviewed in FY21. 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 was 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 initiated a wider supply chain sustainability review in FY22 focusing on supply chain carbon intensity, which we intend to conclude in FY23, including 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

We continue to apply the updated contracts process which we reviewed in FY21 to accommodate a more risk-based approach to contract reviews. The new contracts process operates alongside the new supplier onboarding process and encourages departmental engagement in the assessment and mitigation of contract and supply chain risk including in relation to modern slavery. In addition to our standard form supply contract we have developed additional standard form contracts which, are designed to improve supplier engagement and which 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. We have continued to seek to incorporate these or appropriate equivalent anti-slavery

provisions in new supply contracts entered into in FY22 (including the renewal of contracts with existing suppliers) and will continue to do so in FY23.

In our FY21 statement we explained that we intended 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. Contract renewals during FY22 have provided the opportunity for KPIs to be revisited and we are comfortable that they remain appropriate and effective. We intend to continue to utilise the contracts process, particularly in relation to contract renewals in high risk business sectors, to review KPIs for this purpose.

#### Supplier awareness

In FY22 we continued to seek to raise supplier awareness of modern slavery through the supplier onboarding process, which aims to improve supplier engagement in risk management and mitigation.

#### Staff training and awareness

New staff continue to receive anti-slavery training as part of their induction process.

During FY22 our ethical awareness campaign continued through 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 FY23.

#### Progress on last year's objectives

In last year's statement we confirmed that our efforts in FY21 would be concentrated on further improving supply chain transparency by utilising our redesigned supplier onboarding process and the valuable information that it provides. We highlighted 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 modern slavery risk assessment processes
- 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

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 consolidate the application of our existing processes in order to ensure that these are utilised in the most efficient manner in order to mitigate modern slavery risks that may be posed by our supply chain. We intend to implement the following actions:

- Complete the supply chain sustainability review including a human rights risk assessment of key suppliers

- Continue the review of supplier KPIs on contract renewals, particularly in higher risk business sectors to ensure that they do not drive pressures which may exacerbate the risk of modern slavery
- Continue to identify opportunities to raise awareness of modern slavery within our supply chain and amongst our staff.

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

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*Shane Pickering*

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**Shane Pickering, Chief Executive Officer**

**28 September 2022**