Anti-slavery statement FY23

This is the eighth 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 2022 to 31 March 2023 (inclusive)("**FY23**") 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/news/publications**

In FY23 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 FY23 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/news/publications**

Infinis continues to conduct all 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 a leading generator of low carbon power in the UK. Infinis is committed to generating a low carbon future and is already delivering a positive impact on climate change.

In FY23 the Infinis group operated four business divisions from sites across the UK: captured landfill methane (**CLM**); captured mineral methane (**CMM**); flexible generation (**FG**); and solar PV (**Solar**). Infinis is also developing battery storage projects with the first project commencing 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 FG 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 FY23 the Infinis group generated 1,205 GWh of low carbon electricity from 136 sites across the UK. The CLM division remained Infinis' largest division with an installed capacity of 220MW across 93 landfill sites across the UK. The CMM division operated 41MW of installed capacity across 12 sites, the solar division operated 11MW of installed capacity across 2 sites and the flexible generation division operated 171MW of installed capacity from 29 sites.

The nature of the Infinis supply chain and arrangements with suppliers has not changed significantly compared to the position reported in the previous statement. We continue to maintain longstanding relationships with a number of suppliers who provide goods and services to our CLM, CMM and flexible generation business divisions. Where synergies exist, the same suppliers provide goods and services to solar and battery storage development projects; where they don't then industry specific new

suppliers have been onboarded to supply these projects. As our development activities gather pace, the number of new suppliers onboarded specifically to supply these areas of the business is increasing.

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 continues to be applied to all new suppliers.

In FY23, other than in respect of major components procured for the solar and battery storage development projects, the principal goods and services procured by the business continued to be almost exclusively supplied by the developed economies of Europe (or to a lesser extent, North America). 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 also remains predominantly within the UK and Europe, subject to the same development project exceptions. 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.

As reported in our previous statements the solar development and battery storage supply chains had been identified and deemed to be at higher risk of modern slavery than other areas of our business. This was principally due to the location of certain solar and battery industry supply chains and concerns previously raised from within the solar industry alleging human rights violations (as reported in our previous statement). We continue to carry out additional due diligence on suppliers to these areas of the business and seek specific commitments from these suppliers during the tender process that materials supplied for our projects are sourced from manufacturers that respect human rights. Spend in this area is increasing but we consider that these existing processes continue to be appropriate.

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 FY23 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/news/publications

Risk assessment

In FY23 we updated the risk assessment of our supply chain that we had performed in previous years to include all direct suppliers with whom we had traded in FY23. As in previous years, our risk assessment considered 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 which was updated in 2023), any known issues identified by relevant teams within the business in the course of the year (of which there were none) and measures that our suppliers have implemented to tackle modern slavery in their own supply chains. 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 FY23 risk assessment identified one higher risk supplier, which supplied goods and services to our solar development projects. This supports our conclusion that the risk arising in relation to solar and battery storage supply chains is considered higher, as described above. In accordance with our established procedures, we obtained further assurances and information with regard to supplier processes and procedures and zero approach to modern slavery and will continue to implement this approach in relation to any such suppliers in future that are considered higher risk. We continue to

encourage suppliers to maintain involvement in industry body initiatives to improve supply chain transparency.

Overall, we consider the risk arising within our business and from our supply chain to generally be low.

Due diligence processes

New suppliers

We continue to apply our due diligence process for onboarding new suppliers, 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 or 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. In FY23 we performed human rights risk assessments on suppliers to the higher risk solar and battery storage development areas of our business in order to provide further comfort that those suppliers maintain adequate policies and procedures and maintain a supply chain that respects the fundamental human rights of individuals. These assessments have raised on concerns. We believe these initiatives continue to 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 a risk-based approach to the review of contract terms under our contracts process which encourages departmental engagement in the assessment and mitigation of contract and supply chain risk including in relation to modern slavery. We seek to incorporate 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 in new supply contracts (including the renewal of contracts with existing suppliers) and will continue to do so in FY24.

We have continued to utilise the contracts process, particularly in relation to contract renewals in high risk business sectors to ensure that they do not drive pressures which may exacerbate the risk of modern slavery.

Supplier awareness

In FY23 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. In FY24 we intend to rollout a Supplier Code of Conduct to assist our smaller suppliers in high risk business sectors to assist their understanding of regulatory requirements including our zero approach to modern slavery.

Staff training and awareness

New staff continue to receive anti-slavery training as part of their induction process and the ethical awareness campaign continued in FY23 through targeted additional training to business teams who deal directly with suppliers in higher risk business sectors.

Progress on last year's objectives

In last year's statement we confirmed that our efforts in FY22 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:

- 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.

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 continue 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.

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

S. Pickering

Shane Pickering, Chief Executive Officer

26 July 2023