



INFINIS GROUP ANTI-SLAVERY POLICY

1 POLICY STATEMENT

We conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to modern slavery and are committed to ensuring there is transparency in our own business and throughout our supply chains. We expect the same high standards from all of our contractors and suppliers and we include specific prohibitions against modern slavery in our contracts with suppliers.

2 WHO DOES THIS POLICY APPLY TO?

This Policy applies to all individuals working within the Infinis group of companies as employees or agents, and all our subsidiaries and their employees and agents. This Policy is provided to our suppliers, who are also required to comply with its provisions, as applicable. This Policy does not form part of any employee's contract of employment and we may amend it at any time.

3 WHAT IS MODERN SLAVERY?

Modern slavery takes various forms, such as slavery, servitude, forced or compulsory labour and human trafficking, all of which are a crime and a violation of fundamental human rights and involve one person depriving another of their liberty in order to exploit them for personal or commercial gain.

4 YOUR RESPONSIBILITIES

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest a breach of this Policy.

If you believe or suspect a breach of this Policy has occurred or may occur in any part of our business or any part of our supply chain, you must notify the Chief Financial Officer as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes a form of modern slavery, you should raise it with your line manager or the Head of HR.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith, their suspicion that modern slavery of whatever form may be taking place in any part of our own business or our supply chain.

5 TRAINING AND COMMUNICATION

New and existing employees are all required to familiarise themselves with and adhere to this Policy. Training and updates will be provided to employees where appropriate. If you feel that you require further information or training please contact the Human Resources Department.

Where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains. Our zero-tolerance approach to slavery must be communicated to all suppliers at the outset of our business relationship with them and as appropriate thereafter.

6 BREACH OF THIS POLICY

Any employee who breaches this Policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy.

7 WHO IS RESPONSIBLE FOR THE POLICY?

The board of Infinis Energy Management Limited has overall responsibility on behalf of the Infinis group for this Policy. The Chief Financial Officer has primary and day-to-day responsibility for implementing this Policy and for monitoring its use and effectiveness. You should contact your line manager or the Head of HR in the first instance if you have any queries in relation to this Policy.

8 CONTACT

Chief Financial Officer:

Northampton Head Office

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Human Resources Department

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