

Anti-slavery statement

References to **we**, **us** and **Infinis** in this statement relate to Infinis Energy Limited on behalf of itself and all of its subsidiaries in the UK including Infinis Energy Services Limited (**Infinis Energy Services**).

Infinis conducts all of its business in an honest and ethical manner. Corporate social responsibility, including ensuring that we only purchase from responsible supply chains, is a cornerstone of our business and we seek to ensure that this is fully embedded within our day-to-day operations from the boardroom down.

We take a zero-tolerance approach to slavery and human trafficking (**modern slavery**) and we are committed to ensuring that 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. We set out in this statement the steps that we have taken since October 2015 to ensure that modern slavery is not taking place in our own business or any part of our supply chains in accordance with section 54 of the Modern Slavery Act 2015 (the **Act**). We also detail additional steps that we plan to take in the next financial year.

Infinis' structure, business and supply chains

Infinis is one of the UK's leading generators of renewable power. We operate a portfolio of generating plants utilising renewable sources and are the largest generator of electricity from landfill gas in the UK.

The majority of procurement activities of the Infinis group are managed by Infinis Energy Services, the group's service company. Infinis Energy Services is therefore effectively the start of our supply chain in most cases. It is for this reason that Infinis Energy Services is leading the way in developing new policies and procedures for the Infinis group in relation to tackling modern slavery.

We have over 600 direct suppliers of goods and services, the majority of which will have their own subcontractors, affiliates and associate entities. Infinis is therefore connected indirectly to multiple entities through numerous contractual relationships.

Written policies and procedures

We have adopted an anti-slavery policy to ensure that our zero-tolerance approach is clearly set out. We require all staff to read the policy and encourage them to contact designated members of our teams if they have any queries or concerns in relation to modern slavery. It is important for us that our employees not only understand that the Act is now in place but also our ethos and approach to tackling modern slavery. We also have a whistleblowing policy in place.

Before we enter into contracts with new suppliers or renew our arrangements with existing suppliers, we consider the risk associated with the arrangement and require the inclusion of proportionate contractual obligations, as appropriate and necessary.

We have also updated our procurement policies and procedures to ensure that they accurately reflect the enhanced due diligence processes which we have adopted as set out in the section below.

Details of our wider commitment to corporate social responsibility are set out in our 2016 annual report which will be uploaded to our website www.infinis.com.

Due diligence processes

- New suppliers

We seek to hold our suppliers to the same high standards as we hold ourselves, and to ensure that our suppliers meet these high standards we employ robust due diligence processes in respect of all new suppliers.

In light of the Act, we have introduced specific due diligence procedures in respect of modern slavery in our supplier set-up process which we are confident will further help us to effectively identify and manage any risk of modern slavery.

- Existing suppliers

Our primary generating equipment is almost exclusively imported from the developed economies of Europe or North America and little of our supply chain spend is outside of these economies, representing minimal levels of social or environmental supply chain risk.

In respect of our existing suppliers, since October 2015, we have mapped out the first tier of our supply chain and carried out a risk assessment on those first tier suppliers to identify those areas where there may be a risk of modern slavery taking place.

We "scored" our first tier suppliers against various different criteria, including (i) the sector the supplier operates in, (ii) the level of our spend with the supplier, (iii) the length of our relationship with the supplier, (iv) the geographical location of the supplier and the prevalence of modern slavery in that location, according to the Global Slavery Index and (v) any ethical breaches by or criminal convictions of that supplier of which Infinis is aware.

This scoring was then used to categorise our suppliers as representing a high, medium or low risk of modern slavery taking place in their business or supply chains. We are very pleased to report that the majority of our suppliers were categorised as low risk and that none of our suppliers were categorised as high risk.

Where suppliers were categorised as medium risk, this was primarily due to either the sector in which the supplier operates or the fact that our relationship with them is relatively new. We are currently developing the follow up actions we plan to take in respect of our medium risk suppliers.

Supply contracts

We have reviewed our standard supply contract and updated it to include contractual obligations that can be sought if necessary, requiring suppliers to take steps to seek to ensure that there is no modern slavery in their own business or their supply chains.

We also plan to work with our suppliers who are not caught by the Act, to help them refine their own processes, should they require it.

Performance indicators

We understand that a focus on key performance indicators (KPIs) may unintentionally increase pressure on suppliers to produce goods or services on a quick turn-around, which could in turn increase the risk that modern slavery is used by our suppliers to meet unrealistic timescales. We take steps to mitigate any negative impact of KPIs, by undertaking regular monitoring of the KPIs we have in place.

We are extremely proud of the progress we have made since October 2015 in developing our anti-modern slavery policies and procedures, and after careful consideration, we have decided that it is inappropriate at this stage, to adopt any specific modern slavery KPIs. We may develop such KPIs in the future.

Staff training and awareness

We have communicated our anti-slavery policy to all of our staff emphasising our zero-tolerance approach to modern slavery. We have also explained our obligations to publish this statement under section 54 of the Act and we have assured our staff that we will comply with our legal and ethical responsibilities.

We are currently in the process of developing a staff training programme which will initially be rolled out to members of our procurement team, as these are the employees who have the greatest level of direct contact with our supply chain network.

We will then consider rolling out the training programme to other departments where appropriate.

Our plans for the next financial year

Although we have made significant progress in developing our modern slavery policies and procedures, we have already identified several areas that we intend to enhance and develop in 2016/17, including:

- enhancing and extending the existing system in place to monitor corporate social responsibility of our strategic suppliers which will also provide us with additional due diligence and audit tools;
- carrying out more in-depth due diligence on those of our existing suppliers who have been categorised as medium risk;
- developing our risk assessment criteria to provide us with a further improved understanding of the risk posed by our existing suppliers; and
- mapping out the second and subsequent tiers of our supply chain.

Summary

Infinis strives to ensure that it meets the highest ethical standards and that these standards are replicated throughout its supply chains. We welcome the opportunity the Act has provided us with to improve the transparency of our supply chains and we will continue to develop our procedures to ensure that we mitigate the risks of modern slavery and any other impacts of our activities, not only in our supply chains but also in the wider communities in which we operate.

We believe that the steps which we have already taken and the further steps we plan to take in the coming year demonstrate our commitment to this process.

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

A handwritten signature in black ink, appearing to read 'Eric Machiels', with a horizontal line underneath.

Eric Machiels

Chief Executive Officer