

Anti-slavery Statement FY24

Introduction

This is the ninth anti-slavery statement published in relation to the activities of the Infinis Group of companies and is made in accordance with Section 54 of the Modern Slavery Act 2015 (the “**Act**”). It outlines the measures implemented by the Infinis Group during the period 1 April 2023 to 31 March 2024 (inclusive) (“**FY24**”) to prevent modern slavery and human trafficking (“**modern slavery**”) within its (and their) business operations and supply chains.

In this statement, references to **we, us, our, 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 FY24 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 so are required to publish an anti-slavery statement for the FY24 period. Notwithstanding this, the steps that are described in this statement apply equally to all companies in the Infinis Group.

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 is committed to conducting all business activities with honesty, openness and in an ethical manner. Corporate social responsibility, including the procurement of goods from responsible supply chains, is a cornerstone of our business operations. We uphold a zero-tolerance approach to modern slavery. Infinis strives to ensure its supply chains and all part of its business are, and remain, free from modern slavery.

Infinis’ structure, business and supply chains

The principal activity of the Infinis Group is the generation of renewable and low carbon electricity in the UK. Our strategy is focused on growing Infinis into a diversified renewable and low carbon energy business, leveraging our core expertise to play a key role in the UK’s net zero ambitions.

In FY24 the Infinis group operated through three business divisions from 137 sites across the UK with an installed capacity of 0.6GW:

- i) *Captured Methane (CM)*: supporting the UK’s decarbonisation strategy, our Captured Methane division (comprising captured landfill methane and captured mineral methane) prevents environmental emissions from landfill sites and disused mines and utilises the methane as a fuel source to generate renewable electricity;
- ii) *Flexible Generation (FG)*: complementary technologies of Power Response (**PR**) and Battery Energy Storage Systems (**BESS**) (from Summer 2024) provide responsive power to help balance the National Grid electricity network during periods of low generation or high-power demand, helping maintain the UK’s security of electricity supply. FG supports the UK energy transition, in particular the growing intermittency of renewable power generation from wind and solar, while also providing back-up generation capacity under contracts to National Grid; and
- iii) *Solar (Solar)*: solar energy parks use interconnected photovoltaic panels to capture sunlight and create renewable electricity. Infinis has four operational solar sites at the end of March 2024, equating to 0.1GW.

Infinis business divisions operate through subsidiaries of an ultimate parent company, Infinis Energy Group Holdings Limited and its subsidiary, Infinis Energy Management Limited, which oversees group governance. Infinis was acquired in 2016 by investment company 3i Infrastructure plc.

Infinis Limited, Alkane Energy Limited, Infinis Alternative Energies Limited and Infinis Energy Services Limited, together with their subsidiaries (as applicable), operate the CM and FG divisions. 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 operates the solar projects once construction is complete. The development of Infinis' battery storage projects is carried out by Infinis Energy Storage Limited and its subsidiaries.

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 several suppliers who provide goods and services to our CM and FG business divisions. Where synergies exist, the same suppliers provide goods and services to solar and battery storage development projects; where synergies do not exist, 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. We seek to identify preferred suppliers to support multiple projects where possible, to foster relationships and transparency.

The number of direct suppliers of goods and services to Infinis is 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 FY24, other than in respect of major components procured for solar and BESS 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 remains predominately 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 BESS supply chains had been identified to be at higher risk of modern slavery than other areas of our business. This was primarily due to the geographic complexities of certain solar and battery industry supply chains, the growing demand of materials, and previously raised concerns from within the solar industry regarding alleging human rights violations. As our activity in these sectors increase, we recognise the need for additional due diligence and specific commitments from these suppliers during the tender process to help ensure materials supplied for our projects are sourced from manufacturers that respect human rights.

Written policies and procedures

Our anti-slavery policy demonstrates our dedication to ethical conduct and integrity in all our business relationships and supply chains. This policy was reviewed in FY24 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 anti-slavery policy and our sustainability policy, including the protection of human rights can be found on our website:

<https://infinis.com/news/publications>

Risk assessment

In FY24 we continued to update the risk assessment of our supply chain that we had performed in previous years. This included all direct suppliers with whom we had traded in FY24. Our risk assessment considers the length of our relationship with suppliers, the business sectors and geographical locations in which they operate (using the latest Walk Free Foundation Global Slavery Index), 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 FY24 risk assessment continued to support a low to moderate risk profile and reflects the efforts made to mitigate the risk of modern slavery in our supply chain. Going forward, as we look to increase our focus on solar construction, we are very aware of the increased risk within the solar panel supply sector and therefore we will be expecting our contractors to be undertaking appropriate levels of increased due diligence of those suppliers. Accordingly, we will continue to refresh our due diligence of our contractors at appropriate intervals to provide comfort that they have adequate risk mitigation measures in place.

Our zero tolerance approach to modern slavery will continue into FY25 along with our aim to encourage suppliers to our Solar division to be involved 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 the updated 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. 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 perform human rights risk assessments on suppliers to the higher risk of solar and battery storage development areas of our business 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. 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 a risk-based approach to the review of contract terms under our contracts process which operates alongside the supplier onboarding process and encourages departmental engagement in the assessment and mitigation of contract and supply chain risks, including in relation to modern slavery. In FY24 we further refined the contracts process to make it more user friendly to further encourage engagement and additional improvements planned in FY25. 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 FY24 (including the renewal of contracts with existing suppliers) and will continue to do so in FY25.

We continue 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 FY24 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

We utilised a short form Supplier Code of Conduct focussed on regulatory requirements which impact Supplier businesses, to supplement the onboarding process, so as to continue to seek to raise supplier awareness of modern slavery and which aims to improve supplier engagement in risk management and mitigation. We propose to roll out a more detailed Supplier Code of Conduct in FY25.

Staff training and awareness

As part of the induction process, new staff receive anti-slavery training. We enhance our ethical awareness campaign by delivering targeted training to business teams who deal directly with suppliers in high risk business sectors.

Progress on last year's objectives

In last year's statement we confirmed that our efforts in FY23 would be concentrated on consolidating the application of our existing processes in order to ensure they are utilised in the most efficient manner in order to mitigate modern slavery risks that may be posed by our supply chain. Our processes have been further refined and improved in the course of the year and are well established in the business.

Our plans for the next financial year

Next year we intend to implement the following actions:

- We will continue to identify process improvements to ensure that our processes are applied in the most effective manner to mitigate modern slavery risks;
- We will continue to review 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;
- We will continue to identify opportunities to raise awareness of modern slavery within our supply chain and amongst our staff;
- Refresh site signage so as to publish posters on key sites to improve awareness of modern slavery;
- We will continue to review and update our Procurement Policy so that its purpose, commitment and approach continues to effectively mitigate risk; and
- We will roll out a more detailed Supplier Code of Conduct to assist our smaller suppliers in higher risk business sectors in their understanding of regulatory requirements including our zero approach to modern slavery.

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

Shane Pickering

Shane Pickering, Chief Executive Officer

25 September 2024