	Author	Head of Legal	Document Ref	COS 02
	Title	ANTI-SLAVERY POLICY		
	Date Created		Version	Review Date
	Responsibility	Infinis Energy Management Board		


Group policy

Revision	Date	Description	Prepared by	Approved by
	Sept 2025	Update	Ann Marie Teare	IEML Board

Author:

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1. POLICY STATEMENT

1.1 Infinis conducts all of its business in an honest and ethical manner. Infinis takes a zero-tolerance approach to modern slavery and is committed to ensuring there is transparency in its own business and throughout its supply chains. Infinis expects the same high standards from all of its contractors and suppliers and specific prohibitions against modern slavery are included in Infinis’ contracts with suppliers.

2. WHO DOES THIS POLICY APPLY TO?

2.1 This Policy applies to all individuals working within the Infinis group of companies as employees or agents, and all Infinis’ subsidiaries and their employees and agents. This Policy is provided to Infinis’ 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 Infinis may amend it at any time.

3. WHAT IS MODERN SLAVERY?

3.1 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. RESPONSIBILITIES

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

4.2 Employees who believe or suspect a breach of this Policy has occurred or may occur in any part of Infinis’ business or supply chain must notify the Chief Financial Officer as soon as possible.

4.3 If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of Infinis’ supply chains constitutes a form of modern slavery, they should raise it with their line manager or the Director of HR.

4.4 Infinis is 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 Infinis’ own business or our supply chain.

5. TRAINING AND COMMUNICATION

5.1 All new and existing Infinis employees are required to familiarise themselves with and adhere to this Policy. Training and updates will be provided to employees where appropriate. If an employee requires further information or training please contact the Human Resources Department.

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


6. BREACH OF THIS POLICY

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

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7. WHO IS RESPONSIBLE FOR THE POLICY?

7.1 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. Employees should contact their line manager or the Director of HR in the first instance if they have any queries in relation to this Policy.

8. CONTACT

Chief Financial Officer: Keith Reid, Northampton Head Office
Tel: 01604 662400

Director of HR: John Okninski, Northampton Head Office
Tel: 01604 662400