Modern Slavery Statement FY26

Introduction

This is the eleventh modern slavery statement published in relation to the activities of the Infinis group of companies (the **Infinis Group**) and is made in accordance with Section 54 of the Modern Slavery Act 2015 (the **Act**). It outlines the progress made and the measures implemented by the Infinis Group to prevent and mitigate modern slavery and human trafficking (**modern slavery**) within the business operations and supply chains of Infinis Group companies in relation to the period 1 April 2025 to 31 March 2026 (inclusive) **(FY26)**.

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. Infinis' Annual Report is available on our website: https://www.infinis.com/news/publications

In FY26 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 a modern slavery statement for the FY26 period. Notwithstanding this, the steps that are described in this statement apply equally to all companies in the Infinis Group.

Previous modern slavery statements published by the Infinis Group are available on Infinis' 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 parts of its business are, and remain, free from modern slavery.

Our business and structure

The principal activity of the Infinis Group is the generation of renewable and low carbon electricity in the UK. In FY26 the Infinis Group operated through three business divisions from 128 sites across the UK with an installed capacity of 563MW.

i) *Captured Methane (**CM**)*: supporting the UK's decarbonisation strategy, our CM division (comprising captured landfill methane and captured mineral methane) prevents environmental emissions from landfill sites and disused mines from being released to the atmosphere, and instead uses the methane as a fuel source to generate renewable and low carbon electricity;

ii) *Flexible Generation (**FG**)*: complementary technologies of Power Response (**PR**) and Battery Energy Storage Systems **(BESS)** provide responsive power in periods of low generation or high demand; and

iii) *Solar (**Solar**)*: our solar energy parks use interconnected photovoltaic panels to capture sunlight and generate renewable electricity.

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 Limited and its subsidiaries operate the captured landfill methane activities within the CM division. Infinis Energy Services Limited is the group procurement and services company. Infinis is ultimately owned by an economic infrastructure fund, 3i Infrastructure plc.

Infinis' direct workforce at 31st March 2026 were all based in the UK.

Supply Chain

We continue to maintain longstanding relationships with the majority of our suppliers. FY26 saw a move towards direct contracts with pre-existing tier 2 suppliers to our solar division, which has improved the level of supply chain transparency. Due diligence via the supplier onboarding process continues to be applied to all new suppliers.

The number of direct suppliers of goods and services to Infinis is now in the region of 505 (compared to 450 reported in our last statement) and includes both the primary and secondary value chain.

In FY26, 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.

Goods and services are sourced in accordance with our policies and procedures, and goods are used for our own operations and are not further distributed.

The group fully recognises the increased inherent risk of modern slavery within the solar supply chain and proactively works with its contractors to ensure that the risk is minimised on all projects through utilising one photovoltaic panel supplier operating under agreed practice and controls. Every panel on every new project is audited to ensure compliance with agreed supplier procedures and those of their associated supply chain. Despite these robust procedures and controls being in place, we remain vigilant and recognise the need for continued focus, additional due diligence and specific commitments from these suppliers to continue to ensure human rights are appropriately protected.

Written policies and procedures

Our policies and procedures

Our Modern Slavery Policy reflects our commitment to ethical business practices and our zero-tolerance approach to modern slavery. The policy has been reviewed and approved by the Infinis Energy Management Board in FY26 and reflects our current approach to managing these risks.

The Modern Slavery Policy is communicated to relevant employees and suppliers through appropriate training, awareness, and supplier engagement activities. It sits alongside a suite of related internal policies including our Procurement Policy and Sustainability Policy which sit under our overarching umbrella Human Rights Policy, which together reinforce our commitment to responsible business and supply chain practices. Our internal Employee Handbook sets the high standards of working practices that we implement and expect of our staff, and our Whistleblowing Policy provides a confidential and anonymous mechanism for raising concerns.

Our Human Rights Policy is framed around internationally recognised standards and codes including The UN Universal Declaration of Human Rights and the ILO Labour Standards and details our core values, standards, principles and working practices and is publicly available on our website.

Our policies are reviewed at least annually in consultation with key internal stakeholders (e.g. HR, Procurement teams) and updated to reflect changes in legislative requirements, processes and risks. Policies are communicated on internal and external websites and to suppliers as part of the onboarding process, in each case as relevant. Further information regarding our Modern Slavery Policy and our other publicly available policies, including our Human Rights Policy can be found on our website: https://infinis.com/news/publications

Supplier Policies

We require suppliers to comply with applicable Infinis policies and to demonstrate appropriate commitments to ethical business practices as part of our supplier onboarding and assessment process. This is supported by our Supplier Code of Conduct, which sets clear standards of responsible and ethical conduct across our supply chain. We have refreshed our Procurement Policy to reinforce responsible purchasing practices and expectations and as part of ongoing supply chain management, we periodically review our key supplier base to maintain appropriate oversight and focus on effective, long term supplier relationships.

Risk assessment

At the end of FY26 we carried out our annual modern slavery risk assessment of our supply chain in order to update it for FY26. The risk assessment included all direct suppliers with whom we had traded in FY26. 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 in relation to current suppliers in the course of the year (of which there were none), internal due diligence 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 FY26 modern slavery risk assessment continues to support a low to moderate risk profile and reflects the efforts made to mitigate the risk of modern slavery in our supply chain.

Our annual wider human rights risk assessment considers the impact of all aspects of our business, including our supply chain, on the human rights of individuals and the effectiveness of current preventative measures. This risk assessment is reviewed annually or in advance of a significant change in the organisation and/or conduct of trade, in accordance with our Human Rights Policy. We are confident that we have adequate risk mitigation measures in place. The human rights risk assessment continues to demonstrate a low risk arising from our business and supports the overall conclusions of our annual modern slavery risk assessment. In FY26 we considered consolidating the two risk assessments, however, following review we concluded that the separate registers continue to enable each area of risk to be managed and monitored effectively.

Our zero-tolerance approach to modern slavery and human rights abuses will continue into FY27 along with our aim to encourage suppliers to implement measures to improve transparency in their supply chains and, in particular encourage those suppliers to our Solar division to be involved in industry body initiatives with this aim. Overall, we consider the risk of modern slavery arising within our business and from our supply chain to generally be low.

Due diligence processes

New suppliers

During FY26, we reviewed our supplier onboarding and due diligence processes to ensure they remain proportionate to risk. As a result, we propose to introduce a tiered, more risk-based approach to supplier onboarding, with enhanced requirements for suppliers in higher-risk sectors and locations. The approach is designed to strengthen our understanding of our supply chain through supplier engagement and further align suppliers to our expectations with regard to ethical business practices.

Existing suppliers

We continue to monitor suppliers to the higher risk solar and battery storage development areas of our business and perform additional human rights risk assessments where appropriate to provide further comfort on the alignment of those suppliers with our ethical standards. Our Procurement team regularly meet with our suppliers to review performance, when suppliers can discuss any concerns regarding modern slavery.

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. This was further improved in FY26 to strengthen cross-functional engagement. We continue to use our standard form supply contracts, where possible, 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 modern slavery provisions in new supply contracts entered into in FY26 (including the renewal of contracts with existing suppliers) and will continue to do so in FY27.

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. Supplier KPIs 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 and Staff awareness

Our Supplier Code of Conduct raises awareness of human rights and modern slavery issues and helps to ensure transparency in our supply chains and to assist in the assessment and mitigation of risk.

Training is provided on modern slavery risks to our new staff on induction and refresher training provided to existing staff in relevant departments including Procurement and Construction. Training content is developed by Infinis and tailored to the roles/responsibilities of attendees and to address relevant

sector-specific risks present in the supply chain and our own operations, including potential indicators of exploitation and how concerns should be reported. Use of our online learning management system will continue to assist in tracking and auditing completion of the training by relevant members of staff. In FY26 our staff actively identified a potential risk of modern slavery which was investigated and no modern slavery issues were identified in our supply chain. This engagement is a positive reflection of the success of our staff awareness initiatives.

Monitoring and Evaluating

Progress on last year's objectives

We have:

- improved Modern Slavery policy and process reviews by the application of defined self-assessment criteria, in order to document and identify mitigation and improvement actions and provide greater assurance that these remain effective and aligned with the risks in our operations and supply chain;
- developed an updated Supplier Code of Conduct to improve supplier awareness of our expectations in relation to ethical business practices;
- continued to review supplier KPIs to ensure they do not drive pressures that exacerbate modern slavery risks;
- reviewed our onboarding process including the use of third-party verification resources to identify opportunities to further develop our supplier due diligence and risk assessments and strengthen internal risk-based supplier onboarding allowing for greater due diligence for higher risk suppliers; and
- continued to raise awareness of modern slavery externally within our supply chain and internally amongst our staff.

Our plans for the next financial year

Next year we intend to continue to focus on policy and process improvements to ensure they are applied in the most effective manner to mitigate modern slavery risks, including the review of training modules to further improve engagement.

As in previous years, this statement will be uploaded to the Home Office registry for the purposes of transparency.

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

Bruce Heppenstall, Chief Executive Officer

30th September 2026