

## **Anesco Modern Slavery website Statement**

At Anesco we are committed to playing our part in eradicating modern slavery, and to acting ethically and with integrity and transparency in all business dealings. Being responsible is one of Anesco's core values, and these values, together with our mission to accelerate the transition to a sustainable future, form the basis for behaviour and decisions made across Anesco.

This statement refers to the period from 4 April 2023 and will next be updated following our next financial year end on 31 March 2024. It sets out the steps taken by Anesco Limited and its subsidiaries (which together are referred to in this statement as "Anesco"), to prevent modern slavery and human trafficking in our operations and supply chains. It is made pursuant to section 54 of the Modern Slavery Act 2015.

This statement was approved by the board of directors of Anesco Limited on 12 April 2023.

Signed by Hildagarde McCarville, CEO, Anesco

12 April 2023

## **Organisation Structure**

At Anesco we operate within the UK and Europe to design, construct, operate, maintain and optimise high performing renewable energy projects. We also install energy efficiency measures in residential homes to help lift people in the UK out of fuel poverty.

## **Our People**

Anesco employs approximately 260 people, the vast majority of whom are employed in the UK, with operations in the Netherlands, Germany and Denmark. We also employ contractors in the UK as installation partners for our energy efficiency business, and in the UK, Denmark and the Netherlands for our renewable energy development, construction and maintenance business. Anesco does not employ seasonal workers.

Anesco conducts robust checks on any new employee, including eligibility to work in the UK or Europe (as applicable), to safeguard against human trafficking or individuals being forced to work against their will. When employing contractors that operate via a business, we contract with registered companies only.

## **Our Policies in relation to Slavery and Human Trafficking**

At Anesco we are committed to implementing and enforcing effective systems and controls to ensure no modern slavery or human trafficking is taking place anywhere in our own business, and taking all reasonable efforts to ensure the implementation and enforcement of effective systems and controls to ensure no modern slavery or human trafficking is taking place anywhere or in any of our supply chains. We seek to reflect this in the following internal policies:

- Our Anti-Slavery and Human Trafficking Policy, which sets out our commitment to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing the systems and controls described above. Our Anti-Slavery and Human Trafficking Policy encourages employees, contractors, agents and other team members to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage.

- Our Whistleblowing Policy, which reassures team members that they can raise any concerns that they might have without fear of reprisal and explains how to report a whistleblowing concern.

In addition to the above, all Anesco employees are expected to demonstrate our business values, which include being responsible, safe and green.

### **Due Diligence Process and Risk Assessment for Slavery and Human Trafficking**

Anesco contracts with up to 300 suppliers in any given year. Our energy efficiency installation business works with a UK based supply chain. In relation to our renewable energy project construction and O&M business lines, we often source component equipment for our solar and battery projects in particular (including, for example, solar PV panels, battery containers, transformers and inverters) from outside the UK and Europe. These items are sometimes procured directly by Anesco from the manufacturer, and sometimes procured through a third-party organisation which liaises directly with the relevant manufacturer. We also employ sub-contractors on our construction sites, who themselves sometimes sub-contract construction work to third party organisations.

#### *Supplier questionnaire and statements*

To identify and mitigate risks relating to slavery and human trafficking in our supply chains, in a questionnaire that is completed by significant new suppliers we:

- request a copy of the supplier's anti-slavery and human trafficking policy; and
- identify potential risk areas in our supply chains, by asking our suppliers to provide information on how they assess risk within their own supply chain.

If a supplier cannot provide an anti-slavery and human trafficking policy, we apply a risk matrix to determine if further information needs to be requested.

We have sometimes, at the request of our customers, obtained from suppliers a standalone statement that they and their suppliers have a zero-tolerance position towards modern slavery and human trafficking.

#### *Contractual requirements*

Our standard procurement documents include prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, through a requirement to comply with the Modern Slavery Act 2015.

#### *Audits*

During the coming financial year, we intend to carry out "deep dive" compliance checks on a sample of our suppliers. These checks will include questions regarding the relevant supplier's modern slavery policies and practices.

### **Training**

We do not currently provide training to employees on modern slavery; however all employees are taken through our policies, including our Anti-Slavery and Human Trafficking Policy, as part of their

induction. In the forthcoming year we intend to ask each employee to confirm on an annual basis that they are still familiar with our policies, including our Anti-Slavery and Human Trafficking Policy.

#### **KPIs**

By the time that we deliver our next Modern Slavery Statement, we will have completed five “deep dive” supplier checks as referenced in the “Audits” section above and, if we verify gaps in the controls of any of those suppliers, have developed action plans with them to remedy those gaps.

#### **Support for industry initiatives**

We continue to be a signatory to Solar Energy UK’s statement supporting the development of a traceability protocol in the global solar supply chain. This is an important issue and we are pleased to support this industry wide initiative. In addition, during this financial year we intend to join the working group established by Solar Energy UK relating to supply chain transparency, and to implement the supply chain transparency Code that is under development by the Solar Stewardship Initiative.

#### **Anesco Limited**

12 April 2023