

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 1 April 2024 and will next be updated following our next financial year end on 31 March 2025. 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 21 May 2024.

Signed by Hildagarde McCarville, CEO, Anesco

21 May 2024

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 255 people, the vast majority of whom are employed in the UK, with operations in the Netherlands, Germany, Denmark and Belgium. We also employ contractors in the UK as installation partners for our energy efficiency business, and in the UK, Denmark, Belgium 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 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 hundreds of 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 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 confirm that they hold their own suppliers to the same standards that are set out in Anesco's anti-slavery and human trafficking policy.

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.

During the financial year ending 31 March 2025 (**FY25**), we will start to introduce a requirement to obtain references from suppliers before they are onboarded. This will initially be applied to new suppliers within our construction business line, and will be rolled out more widely thereafter. While not aimed specifically at modern slavery issues, we expect that this will assist with uncovering any areas of concern.

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 financial year ended 31 March 2024 (**FY24**), we carried out two "deep dive" compliance checks on suppliers that included questions regarding the relevant supplier's modern slavery policies and practices. No issues of concern were identified. We also visited a supplier located in China and

audited their performance, including modern slavery practices. Again, no issues of concern were identified.

At the time of writing our last Modern Slavery statement, we had intended to carry out five “deep dive” compliance checks; however, following internal discussion, we completed two checks and in addition held a Supplier Day for our top 30 (by spend) suppliers. At the Supplier Day we discussed the importance of compliance issues and introduced a new Anesco Supplier Code of Conduct, which (amongst other things) sets out Anesco’s expectation of ethical and responsible behaviour in the supply chain. During FY24, commitment to the Anesco Supplier Code of Conduct was embedded into the onboarding process for all new suppliers. Our audit intentions for FY25 are set out in the “KPIs” section below.

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.

KPIs

During FY25, we expect to complete 20 “deep dive” compliance checks on our suppliers, including questions regarding modern slavery policies and practices. If we verify gaps in the controls of any of those suppliers, have developed action plans with them to remedy those gaps. We also intend to repeat our Supplier Day.

Support for industry initiatives

During FY24 we joined the Responsible Sourcing working group run by Solar Energy UK (SEUK), directly supporting the development of a traceability standard for the global solar supply chain. The standard will be developed over FY25 and we will continue to participate in the working group and to contribute to this important initiative.

Anesco Limited

21 May 2024