enfinium Supplier Code of Conduct

enfinium

DECARBONISATION
POWERED BY WASTE

Dear valued supplier

I am pleased and proud to present enfinium's Supplier Code of Conduct, which has been prepared to reflect the fast-changing world in which we are operating as well as our Net Zero Transition Plan targets.

As a supplier to enfinium, you are an important partner in realising our company vision to become a decarbonisation business with carbon removals powered by non-recyclable waste. To enable this vision, our mission requires us to:

1. Be the partner of choice for our fuel suppliers and our heat and energy customers.
2. Evolve our Waste to Energy plants into decarbonisation hubs providing local businesses and communities with heat networks, private wire, and hydrogen fuels; and
3. Leverage carbon capture technology to become a carbon removals business.

Our Supplier Code of Conduct is based on relevant international frameworks, standards and legislation governing ethical and sustainable business practices. It complements our comprehensive and binding enfinium Code of Conduct, which guides our employees to do the right thing and upholds our commitments to ethical behaviour and human rights. All enfinium employees, partners and suppliers are expected to be accountable for their actions, to collaborate to promote an ethical culture, and report any potential violations.

We require our suppliers, contractors and other representatives to follow enfinium's Supplier Code of Conduct or apply a similar set of sustainability policies and procedures. For that reason, our Supplier Code of Conduct is included in our procurement terms and conditions.

Thank you for choosing to work with enfinium and for your valuable contribution to our business and to serving our customers. We look forward to even closer collaboration as we work together to enable decarbonisation powered by non-recyclable waste.

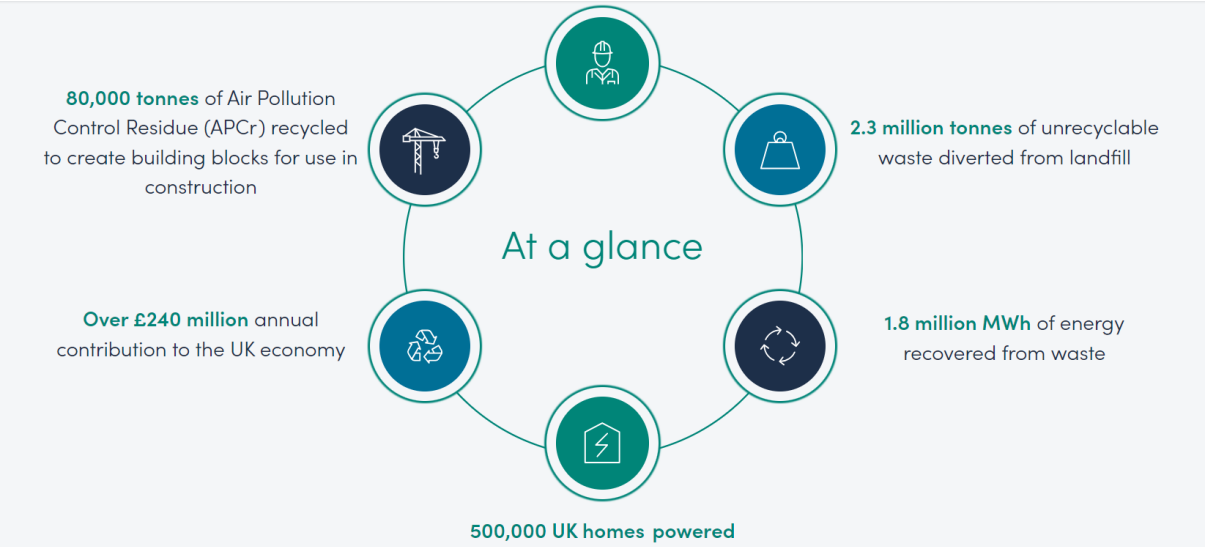
Best regards,

Mike Maudsley
Chief Executive Officer
enfinium

Introduction

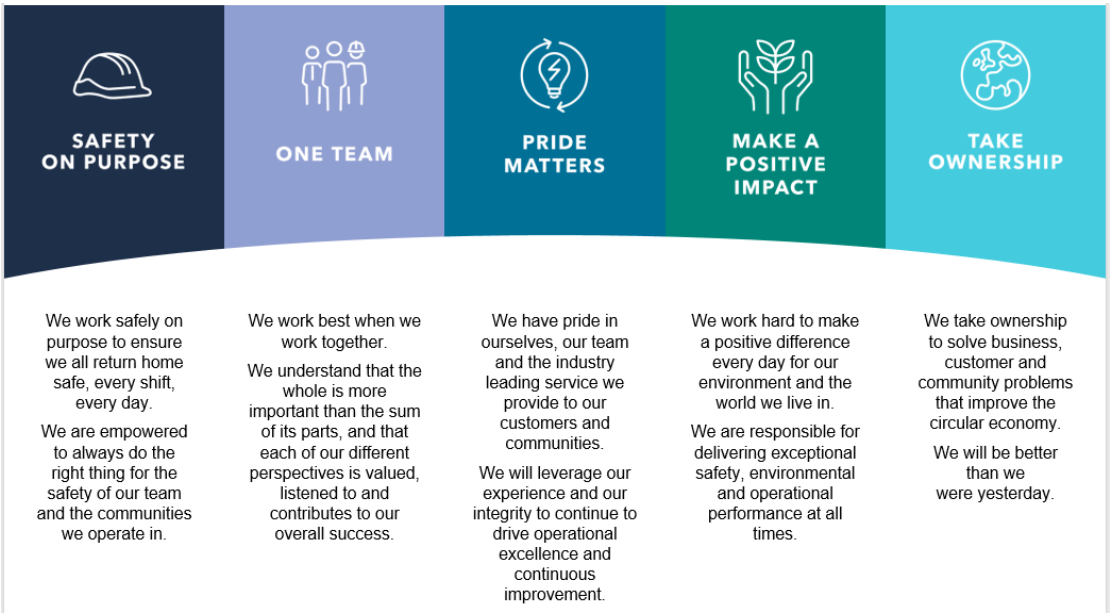
With our exiting facilities we divert up to 2.3 million tonnes of unrecyclable waste from climate-damaging landfill and repurpose the waste to generate homegrown, reliable energy, capable of powering more than 500,000 UK homes and our estate continues to grow.

Our ambition is to transform our facilities into local 'decarbonisation hubs' and using our existing Waste to Energy infrastructure, we will contribute to heat networks, generate electrolytic hydrogen, and use carbon capture technology to produce reliable, high-quality carbon removals. These efforts are essential for the UK to reach net zero emissions by 2050.



enfinium values the relationship we have with our suppliers, as you play an integral part in helping create a more socially sustainable, economical and environmentally responsible supply chain.

Our values describe what we stand for and guide our behaviour. They set the tone and shape the culture of our organisation.



We work with our stakeholders to assess the needs of the business and the requirements for selecting a supplier. All relevant checks are carried out before a Supplier can be approved for use by the business. Supplier performance is measured on a regular basis for ongoing excellence.This allows us to follow the principles of sustainability, equality and accountability in all our actions. Suppliers are expected to operate in a responsible and ethical manner.

enfinium is committed to ethical business practices and upholding the highest standards of integrity in all our operations. Our supplier Code of Conduct ('Code') outlines the minimum standards that we expect from all of our suppliers and subcontractors, regarding labour, human rights, health and safety, environment and anti-corruption. This applies to all suppliers, contractors, sub contractors, service providers, professional services providers, consultancies, intermediairies and agents and we expect your supply chain to act in accordance with this. In addition, suppliers are expected to adhere to all applicable laws and regulations.

Compliance with the Code of Conduct is mandatory for all Suppliers and forms part of the terms of any business relationship with enfinium.

People

In line with our values, enfinium cares that their employees and suppliers return home safely, every shift, every day.

Health and Safety

enfinium continually strives to achieve the highest standards of health, safety and environmental practices and performance in all its activities, and it expects its Suppliers to aspire to similar standards.

To work with enfinium you must understand your health and safety responsibilities and be committed to creating an environment that is safe, healthy, and secure for all your employees and

anyone who may be affected by your activity. Suppliers must understand that the safety of employees, contractors and members of the public is a mutual priority.

All operational enfinium sites operate to ISO 450001 (Health & Safety), ISO 14001 (Environmental) & ISO 9001 (Quality) standards and while it is not mandatory for suppliers to be certified to these standards, enfinium requires suppliers to operate to comparable good practices and in compliance with all relevant legal requirements.

Human Rights and Modern-Day Slavery

enfinium expects all businesses in our supply chain to share our commitment to respecting, protecting, and promoting human rights. Suppliers must comply with all applicable laws, rules, and regulations, including but not limited to the UK Modern Slavery Act 2015 and any relevant international standards on human rights and labour practices. Suppliers must also meet all industry-specific legal and regulatory requirements in their operating countries.

Suppliers are expected to treat people with dignity and respect and promote and maintain an ethical and inclusive culture in the workplace.

Suppliers are expected to respect the right of workers to associate freely and communicate with management regarding working conditions without fear of harassment, intimidation, or penalty.

enfinium expects their Suppliers to commit to tackling the threat of modern-day slavery just as we are committed to doing so. Suppliers should implement policies, practices and due diligence checks to ensure that modern slavery, child labour and human trafficking are not taking place in their supply chain or in any part of their business.

See our Modern Slavery Statement here.

Suppliers must ensure that all work is freely chosen and that all forms of forced labour are prohibited, including human trafficking, debt bondage, forced overtime, and involuntary prison labour. Suppliers must not engage in any practice that compels workers to remain employed by withholding identification documents, imposing financial penalties, or other restrictions.

Suppliers must not employ children under the legal working age in their country or under 15 years of age, whichever is greater, in accordance with the International Labour Organization (ILO) standards. Suppliers must also comply with local laws regarding working conditions for young workers and ensure they are not engaged in hazardous or exploitative conditions.

Suppliers must treat all employees with dignity and respect and must not tolerate any form of abuse, harassment, or exploitation. Suppliers should provide fair remuneration, reasonable working hours, and humane treatment of employees. Overtime should be voluntary and paid in accordance with applicable laws.

Sexual Harassment

Suppliers must maintain a workplace free from sexual harassment. Suppliers should ensure their employees and contractors are aware of the code and understand what constitutes sexual harassment. Suppliers should have policies and procedures in place to prevent and address sexual harassment, including reporting mechanisms and disciplinary actions. Suppliers should also be required to train their employees on the code of conduct and the prevention of sexual harassment.

Inclusion and Diversity

At enfinium we embrace diversity and inclusion and actively promote the benefits of inclusion and diversity amongst all our employees. Supplier are encouraged to abide by the same standard. Everyone is of value and has the right to be their authentic self at work and be free from harassment. enfinium has a zero-tolerance approach to discrimination in any form. Suppliers are expected to create a working environment free from physical, psychological and verbal harassment or any other form of abuse.

Suppliers are expected to comply with all legislation and guidelines which promote equality of treatment and opportunities regardless of sex, race, colour, age, disability, gender, sexual orientation, religion, political views, marital status, caring responsibilities, ethnic origin, or union membership.

Suppliers must respect the rights of workers to associate freely, join or not join labour unions, seek representation, and engage in collective bargaining in accordance with local laws. Suppliers should not discriminate against workers for their union membership or activities.

Social Value

enfinium recognises it has a responsibility not only to its employees but also to have a positive impact to the wider communities where we work.

We are committed to empower our employees to make a real difference in the communities where we work and in which we serve. enfinium's community funding supports charitable giving, community funding, volunteering, and sponsorship through outreach and engagement. We understand our Suppliers have a role to play and therefore you need to consider the responsibilities and the impact you will have on the local area and wider communities. Suppliers operating at our sites should employ and train local people where possible. Commit to training and developing their own employees of all ages and abilities and from all backgrounds. Suppliers must try to build positive relationships with the community and minimise disruption.

Suppliers must pay employees at least the minimum wage required by law and provide all legally mandated benefits. Working hours, overtime, and rest periods should be in compliance with local laws and industry standards. Suppliers should aim to provide a living wage where possible and ensure timely payment of wages without deductions not authorised by law or agreed with employees.

Business Ethics

Bribery and Corruption

At enfinium, we have a zero-tolerance approach to any type of bribery, fraud, tax evasion or corrupt business practices and we expect the equivalent from our suppliers.

Suppliers must comply with any laws that prohibits corruption and/or bribery in any part of the world where Suppliers conduct business.

Suppliers must never accept, offer, pay or request bribes or any other form of enticement either directly or indirectly under any circumstances with the intention or appearance of improperly influencing a business decision or securing an unfair advantage. Suppliers should have procedures in place to comply with all applicable anti-corruption laws including the UK Bribery Act 2010. Suppliers must have reporting channels in place so employees can raise concerns about inappropriate business practices and unethical behaviour without fear of repercussions.

Please report any issues through our Whistleblowing hotline, Safecall here https://www.safecall.co.uk/file-a-report/

Gifts and Hospitality

enfinium values relationships on trust and respect. We recognise that offering gifts and hospitality can be an included as part of normal business practices providing it is not intended, or appears to be intended, to influence a business decision or transaction in an improper way. Under no circumstances should a gift or hospitality be offered by a Supplier who is engaged in a tender or negotiation process. Please refer to enfinium's Anti-bribery and Corruption Policy available on request.

Data Protection

Data Protection and privacy laws regulate the collection, storage, use, disclosure, retention and disposal of personal information, which can identify a living person. enfinium takes protecting the personal data of our suppliers, employees and third parties we interact with seriously. Please refer to enfinium's data protection policy available on request.

All uses of personal data should be carried out in accordance with applicable laws and regulations. We and our suppliers should only collect personal information required to fulfil the service the Suppliers are providing and to not further process this information in a manner incompatible with this service. Suppliers should only process any personal data shared with you by enfinium lawfully and in accordance with your contractual obligations. Suppliers should take all reasonable measures to prevent enfinium's confidential information from being disclosed to any person who does not need or have the right to that information.

You should report to enfinium as a matter of urgency any unauthorised disclosure of personal data.

Cyber Security

Failure to protect sensitive and classified information can have catastrophic reputational impact. enfinium take steps to eliminate the risk of a cyber security breach and expect our suppliers to have systems with appropriate protection. It is imperative that Suppliers safeguard the integrity and security of their systems and comply with the relevant UK data security laws. Suppliers must inform enfinium if they become aware of any cyber security incident that affects or has the potential to affect enfinium's data.

All suppliers should use enfinium's secure access solution to access the operational technology environment. If this is not possible and when visiting site, all suppliers will need to have their equipment scanned for malware before connecting to any parts of the network.

Sustainable Environment

Our Waste to Energy facilities are governed by some of the world's strictest environmental regulations, where we are required to meet or exceed stringent standards on emissions controls. Our environmental strategy focuses on achieving four ambitions. All designed to ensure we have a beneficial effect on the world around us:

Environmental Protection – We ensure we protect biodiversity, ecological areas and associated ecosystem services, such as food, air, and water.

Climate Change - We work towards lower greenhouse gas and emissions to help meet reduction targets and Net Zero aspirations.

Air Quality Management - We effectively monitor and remediate air pollution (SOx, NOx and other air emissions) as well as other on-site pollution and emissions.

Sustainable Resources - We manage land and water resources effectively, encourage recycling and use resources sustainably wherever possible.

Our value "Making a positive impact" reflects this and we expect the same values from or Suppliers.

Monitoring and Auditing

enfinium reserves the right to monitor and audit suppliers' compliance with this Code through scheduled or unannounced inspections, site visits, and/or third-party audits. Suppliers are required to provide access to records and cooperate fully with any investigations related to their adherence to this Code of Conduct.

Reporting and Remediation

Suppliers are expected to promptly report any actual or suspected violations of this Code to enfinium. Suppliers must also develop a remediation plan to address any violations and cooperate with enfinium in implementing corrective actions. Suppliers are encouraged to implement grievance mechanisms for their workers to raise concerns confidentially and without retaliation.

Suppliers are encouraged to commit to continuous improvement in their policies, practices, and working conditions. This includes regular self-assessments, worker feedback mechanisms, and ongoing training on ethical and labour standards.

Termination of Business Relationship

enfinium reserves the right to terminate any relationship with a supplier that fails to comply with this Code. Repeated or egregious breaches of this Code will lead to the termination of any contracts and business dealing.

Supplier Acceptance

Supplier Name.....

Signature.....

Date.....

Signatory Name.....

Position.....

T2-ENF-PRO-6588 - enfinium Supplier Code of Conduct			
Document History			
Revision	Comments	Date	Approver
1	Initial Release	05.05.26	Gurprit Sandhu