



Modern Slavery Statement 2024

Introduction

Enfinity Global Inc. and its controlled affiliates (collectively “Enfinity”), is committed to conducting business with integrity and transparency. We recognize the importance of combating modern slavery and human trafficking in all forms, and we are dedicated to protecting human rights within our business and across our supply chains.

This statement is made pursuant to the UK Modern Slavery Act 2015 (“Act”) and is made on behalf of the Enfinity affiliates conducting business in the UK and covered by the Act, including EG UK Development Limited (collectively the “Reporting Entities”). This statement reflects Enfinity’s approach to addressing modern slavery risks in its operations and supply chain, which includes the adoption of relevant policies and due diligence procedures, which also apply to operations of the Reporting Entities.

Our Business and Supply Chain

Enfinity is a leading renewable energy and sustainability services company, headquartered in Miami, Florida, United States of America, with operations in the USA, UK, Europe and Asia. Our supply chain includes global suppliers of raw materials, components, and specialized services in renewable energy and related technologies. Due to the international nature of our industry, certain regions where we and our suppliers operate may present higher risks of forced labor and human trafficking, which informs our risk-based due diligence procedures.

Our Policies on Modern Slavery and Human Trafficking

Enfinity is committed to fostering an ethical and compliant business environment that is focused on addressing modern slavery and other human rights risks throughout our global supply chain. Specifically, we seek to mitigate modern slavery risks through the following policies:

- **Ethics Code:** We require all professionals acting on our behalf to adhere to the highest ethical standards, and we explicitly prohibit the use of illegal, abusive, or forced labor, including victims of modern slavery and human trafficking.
- **Supplier Code of Conduct:** We require our suppliers to comply with our Supplier Code of Conduct, which outlines our expectations for fair labor practices, including the prohibition of forced labor, child labor and human trafficking.
- **Know Your Supplier Policy:** We define a risk-based due diligence process for onboarding new suppliers or renewing existing suppliers that helps Enfinity to avoid entering relationships that could harm our reputation or violate applicable laws.
- **Anti-Bribery and Anti-Corruption Policy:** We convey to all Enfinity’s professionals and third parties an unambiguous message of opposition to bribery and corruption in all of its manifestations. We require our professionals and third parties to fulfill all business activities in strict compliance with applicable laws, including those related to anti-corruption and anti-bribery.

Due Diligence and Risk Assessment

Enfinity undertakes robust, risk-based due diligence measures to mitigate the risks of modern slavery within our supply chain. Our due diligence efforts include:

- **Supplier Screening:** We conduct screening on new suppliers to identify compliance or reputational risks, including related to forced labor, child labor and human trafficking.
- **Contractual Obligations:** We include clauses in our supplier agreements requiring adherence to anti-modern slavery laws and granting us the right to audit suppliers for compliance.

Training and Awareness

To strengthen our commitment, we provide training to all employees, especially those involved in procurement, supply chain management, and who work directly at our plants, to help them identify and mitigate modern slavery risks. Training covers identifying warning signs of modern slavery, understanding reporting protocols, and best practices for fostering an ethical supply chain.

Open Reporting

Enfinity has a group-wide reporting channel available for raising any concerns, including those related to integrity or compliance. Our professionals and suppliers are empowered to report actual or suspected violations of our policies or the law. To encourage reporting of such concerns, Enfinity prohibits retaliation against any person raising a good-faith concern. Enfinity has appointed a global Supervisory Body to oversee the management of the Enfinity reporting channel and to ensure that any reports are handled through an independent global mechanism.

We have also set up a secure Enfinity Ethics Hotline. Concerns may be raised via phone or by filing an online report. Contact details and further information may be found at <https://enfinity.global/other/complaint-channel/>.

Monitoring and Continuous Improvement

Enfinity continually monitors the effectiveness of our policies and practices. We periodically review our risk assessment procedures and report any findings to our Supervisory Body. We also collaborate with industry partners to share best practices and address potential risks in our sector.

We are dedicated to continually improving our policies and practices to combat modern slavery and human trafficking.

Governance

Enfinity has embedded modern slavery compliance in our governance model. Our Global Head of Compliance & ESG, and our Global ESG Manager work together to establish ESG priorities and coordinate Enfinity's global ESG initiatives, including modern slavery compliance. These activities are coordinated under supervision of our global Supervisory Body, with periodic reports to the Enfinity Board of Directors.

Approval

This statement has been approved by the Board of Directors of Enfinity Global Inc. and EG UK Development Limited on November 15, 2024.

The statement is signed by the Chief Executive Officer of Enfinity Global Inc. and a Director of EG UK Development Limited:

A handwritten signature in black ink, appearing to read "Carlos Domenech".

Carlos Domenech,
CEO, Enfinity Global Inc.
Director, EG UK Development Limited
November 15, 2024