



**Modern Slavery Act Transparency
Statement for the Financial Year
ending 31 March 2023**

1. Modern Slavery Act Transparency Statement for the Financial Year ending 31 March 2023

The Modern Slavery Act 2015 prohibits slavery, servitude, forced or compulsory labour and human trafficking (collectively referred to throughout this statement as “**Modern Slavery**”). Last Mile Infrastructure Group Limited (11534385), and our direct and indirect subsidiaries (the “**Last Mile Infrastructure Group**” or the “**Group**”), are committed to conducting business in a fair, open and honest manner and take a zero-tolerance approach to all forms of Modern Slavery.

This statement sets out the steps taken by the Group in the Financial Year ending 31 March 2023 to identify and mitigate the risk of Modern Slavery occurring in our business and in our supply chains.

2. About the Last Mile Infrastructure Group

The Last Mile Infrastructure Group designs, installs, owns and operates multi-utility infrastructure networks, including gas, electricity, water and wastewater, as well as smart meters, connecting new build properties across the United Kingdom. The Group is a portfolio company of Infracapital, the infrastructure equity investment arm of M&G plc, and is organised into seven operational companies:

- **Energetics Design & Build Limited** (SC2324695) and **UK Power Solutions Limited** (06256696) design and build gas, electricity and water infrastructure for residential, mixed-use and commercial developments;
- **Last Mile Gas Limited** (SC303150) and **Last Mile Electricity Limited** (SC234694) own and operate installed gas and electricity assets (respectively) under licence from the Gas and Electricity Markets Authority (commonly referred to as the Office of Gas and Electricity Markets, or “Ofgem”);
- **Last Mile Asset Management Limited** (SC546822) adopts, operates and maintains the multi-utility infrastructure networks originated by UK Power Solutions, Energetics and numerous other Independent Connection Providers across the United Kingdom, ensuring new developments for both national and regional housebuilders and developers are connected to essential infrastructure;
- **ICOSA Water Limited** (09155925) designs, builds and adopts (via its subsidiary, Icosa Water Services Limited) water and wastewater connections in England and Wales.
- **Last Mile Heat Limited** (13387039) own and operates heat networks for residential, mixed-use and commercial developments across mainland in England, Wales and Scotland.

Our Head Office is Fenick House, Hamilton International Technology Park, Glasgow, G72 0FT. We also have offices in Gloucestershire, Warrington, London, Cambridge, Swindon and Cardiff. As at 31 March 2023, we employed 801 staff across the Group. All of our employees are based in, and all of our work is undertaken in, the United Kingdom.

3. Introduction

The Last Mile Infrastructure Group aims to identify and mitigate the risk of Modern Slavery occurring within its business and supply chains. The Last Mile Infrastructure Group has a responsibility to understand the risks in its business and supply chains and has a specific Modern Slavery Act Policy, which is approved by the Group's Chief Executive Officer and compliance with it is monitored by the Group's Risk and Compliance function.

4. Employees

The Last Mile Infrastructure Group supports fundamental human rights and is committed to a safe workplace that values equal opportunity, and that is free from discrimination, harassment and victimisation.

The Group has robust policies and procedures concerning employment screening (including work eligibility checks and confirming that prospective employees are in possession of their own identity documents, including valid passports), employment conditions and appropriate workplace behaviour.

All staff are expected to abide by the spirit, as well as the requirements of the Group's policies and procedures concerning Modern Slavery, Whistleblowing, Anti-Bribery and Corruption and Equal Opportunities. Employees are encouraged to report breaches of these policies to their line managers and/or senior executives in the Group. All employees have access to a confidential 24/7 Employee Assistance Programme.

5. Suppliers

The Last Mile Infrastructure Group's business is both office and field-based with the main supply chain categories comprising of:

- manufacturers and suppliers of construction materials for electric, gas, heat, water and wastewater connections;
- suppliers of plant, vehicles and equipment;
- sub-contractors providing specialist construction and emergency response services;
- professional services in relation to utilities networks and connections as well as financial, legal, tax and regulatory advice; and
- recruitment agencies.

We use a variety of local and national suppliers to source goods, services, equipment and human resource for the operation of the business. While we operate within the UK's construction industry, which is considered a

sector to be at higher risk of Modern Slavery, based on our 'well-known' supply chain profile and the industry sector in which we specifically operate, the risk to the Group is considered to be moderate.

We continue to review the risk that our supply chains present and whilst we consider our exposure to Modern Slavery to be moderate, we expect our suppliers and sub-contractors to demonstrate a zero-tolerance approach to the exploitation of people.

The principal way in which we approach managing the risks of Modern Slavery is by using the procedures set out in our Policy, including due diligence of our supply chain to establish what steps, measures and practices they have implemented to prevent Modern Slavery occurring in their organisations and ensuring that contracts contain provisions allowing for automatic termination for breach of the Modern Slavery Act 2015 (on a risk adjusted basis).

6. Customers

The Last Mile Infrastructure Group is committed to ensuring that compliance with the Modern Slavery Act 2015 is at the heart of both its upstream and downstream supply chains and, to that end, is working to include compliance with the Modern Slavery Act 2015 in all of its customer vetting processes i.e., developers and utility connection providers.

7. Steps Taken

The Group took the following steps in the financial year to which this statement relates:

- We reviewed our Modern Slavery Policy which we do at least annually.
- We renewed our Employee Assistance Programme, which includes 24/7 access to a confidential helpline. Our Energetics business continued to ensure that all new and existing subcontractors have signed up to the Group's updated terms and conditions which includes demonstrating compliance with the Modern Slavery Act 2015.
- The Last Mile Asset Management business revised the Independent Connection Provider Assessment Process, which will support adherence to the Modern Slavery Act 2015.
- Our UKPS business implemented new subcontractor and onboarding terms.
- We have established a Group-wide elearning platform which will allow, among other regulatory and compliance training topics, Modern Slavery related training to be delivered remotely on an annual basis.
- We continued to identify, assess and mitigate against any potential risk areas to ensure the effectiveness of the systems and controls we have in place to ensure that no form of Modern Slavery takes place within our business operations or our supply chains.

- Creation of a new Internal communications function to provide a formal means of raising awareness and communicating with Last Mile employees. This has also resulted in the creation of an annual communication plan which includes Anti-Slavery Day on October 18th.

8. Training and Capacity

- Communication of our Modern Slavery Policy forms part of employee, contractor and subcontractor on-boarding procedures.
- Our Modern Slavery Policy is publicised internally to raise awareness.
- We provide Modern Slavery training through our Group-wide e-learning platform and is completed on an annual basis.
- This document is published on the websites of our operating companies and is available on request.

9. Governance

This *Modern Slavery Act Transparency Statement* is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and was approved by the boards of each of the Last Mile Infrastructure Group companies.



Michael Pearce
Chief Executive Officer, Last Mile Infrastructure Group