



| Modern Slavery

| Modern Slavery Policy

1. OUR PURPOSE

At Last Mile, we design, build, own and operate essential utilities infrastructure so people across Great Britain have access to the heat, power, water and wastewater services they need, every day.

Our purpose is to deliver utilities infrastructure that communities can rely on, now and in the future.

2. POLICY STATEMENT

Modern Slavery is a term used to encompass a variety of criminal activities that exploit individuals through violence, deception, or coercion. It is a grave violation of human rights and typically involves situations of exploitation that a person cannot refuse or leave due to threats, violence, coercion, deception, or abuse of power.

It is Last Mile's policy to conduct its business in a fair, open and honest manner and to take a zero-tolerance approach to all slavery, servitude, forced or compulsory labour (including child labour) and human trafficking and to comply with the law relating to modern slavery, namely the Modern Slavery Act 2015 which sets out measures on how modern slavery and human trafficking is dealt with in the UK.

In order to achieve this, Last Mile is committed to:

- acting professionally, fairly and with integrity in all business dealings and relationships wherever we operate;
- prohibiting all forms of Modern Slavery, all of which are a crime and a violation of fundamental human rights and have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain;
- compliance with all laws relevant to countering modern slavery including the Modern Slavery Act 2015, approved Codes of Practice and industry recognised guidelines;
- ensuring, so far as it is reasonably practicable to do so, that contracts contain provisions allowing for automatic termination for breach of the Modern Slavery Act 2015;
- investigating thoroughly any actual or suspected breach of this Policy, or the spirit of this Policy;
- implementing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our business or in any of our supply chains;
- consulting with staff and providing appropriate information, instruction and training to ensure all staff are aware of their Modern Slavery Act 2015 obligations;
- undertaking an ongoing programme of audit and ensuring that enough resource is allocated as required for the implementation of this Policy; and
- communicating this Policy to staff, contractors, suppliers, customers and other interested

parties.

3. SCOPE

Last Mile is within the scope of this document. We also expect the same high standards from all our contractors, suppliers and other business partners.

4. DEFINITIONS

Unless a contrary intention is evident, or the context requires otherwise, words or expressions contained in this document shall have the same meaning as set out in the Articles of Association of Last Mile and the following defined terms shall have the specific meanings given to them below:

Board	means the Chairperson, Executive Directors and Non-executive Directors of Last Mile.
Chairperson	means a Member of the Board who is appointed pursuant to Article 11 of Last Mile's Articles of Association.
Committee	means a committee appointed by the Board, which reports to the Board.
Company Secretary	means the person who is appointed pursuant to Article 72 of Last Mile's Articles of Association.
Employee	means a person paid via the payroll of Last Mile, or for whom Last Mile has responsibility for making payroll arrangements but excluding Non-executive Directors.
Executive Director	means a Member of the Board who is appointed pursuant to Article 20.1 of Last Mile's Articles of Association.
Last Mile	means Last Mile Infrastructure Group Limited and its direct and indirect affiliates.
Non-executive Director	means a Member of the Board who is appointed pursuant to Article 20.2 of Last Mile's Articles of Association.
Policy	means this policy document.

5. ROLES AND RESPONSIBILITIES

The Board has overall responsibility for maintaining the corporate governance framework of Last Mile, including this document.

The Company Secretary has responsibility for:

- publicising the existence of the corporate governance framework and all associated controlled documents;
- ensuring all corporate governance framework documents, policy documents and Committee terms of reference are published on the intranet;
- maintaining a register of all corporate governance framework documents, policy documents and Committee terms of reference; and
- ensuring all corporate governance framework documents, policy documents and Committee terms of reference are reviewed no later than their agreed review date.

6. DISTRIBUTION AND IMPLEMENTATION

Distribution Plan

- This document will be made available on the Last Mile intranet and internet site.
- A global communication will be issued to all Employees notifying them of the release of this document.

Training Plan

- A training needs analysis will be undertaken with Employees affected by this document.
- Based on the findings of that analysis appropriate training will be provided as necessary.

7. MONITORING

Compliance

- Compliance with this document will be monitored by the Risk, Assurance & Compliance Committee.
- Mechanisms are available and communicated to employees to enable reporting of modern slavery related concerns.
- Investigations into suspected instances of modern slavery and human trafficking are undertaken through to an appropriate conclusion.
- This Policy will be reviewed annually.

8. ASSOCIATED DOCUMENTATION

- Annual Modern Slavery Act Transparency Statement
- Whistleblowing Policy
- Whistleblowing Procedure
- Supplier Code of Conduct

- o Code of Ethics

9. REFERENCES

None.

APPENDIX 1 VERSION CONTROL TRACKER

Version	Date	Author Job Title	Status	Comments
V00.01	28/11/2018	Chief Executive Officer	Draft	First draft for comment
V00.02	01/02/2019	Chief Executive Officer	Draft	Second draft for comment
V01.01	05/02/2019	Chief Executive Officer	Final	Final version agreed
V01.02	02/10/2019	Chief Operating Officer	Draft	Rebrand draft for comment
V02.02	11/10/2019	Chief Executive Officer	Final	Rebrand final version agreed
V03.01	02/09/2020	Chief Operating Officer	Draft	Revised version for comment
V03.01	07/10/2020	Chief Operating Officer	Final	Final version agreed
V04.01	31/08/2021	Risk and Compliance Advisor	Draft	Revised draft for comment
V04.01	05/10/2021	Chief Operating Officer	Final	Final version agreed
V05.01	15/11/2022	Head of Risk and Assurance	Draft	Revised draft for comment
V05.01	30/11/2022	Chief Operating Officer	Final	Final version agreed
V06.01	18/09/2023	Head of Risk and Assurance	Draft	Revised draft for comment
V06.01	25/09/2023	Chief Operating Officer	Final	Final version agreed
V07.01	25/09/2024	Governance, Risk & Compliance Manager	Draft	Revised draft for comment
V07.01	22/01/2025	Director, Legal & Governance	Draft	Revised draft for comment
V07.01	22/01/2025	Chief Executive Officer	Draft	Revised draft for comment
V07.02	24/01/2025	Chief Operating Officer	Final	Final version agreed
V07.03	29/01/2025	Chief Operating Officer	Final	Approved by Board
V08.01	14/01/2026	Head of Risk, Assurance & Compliance Director, Legal & Governance	Draft	Minor clarificatory amendments.