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## Modern Slavery and Human Trafficking Transparency Statement - 2026

This statement is published on behalf of Amber Infrastructure Group Holdings Limited, Amber Infrastructure Limited and Amber Fund Management Limited (**Amber**) pursuant to section 54 of the UK Modern Slavery Act 2015 (the **Act**). It constitutes our modern slavery and human trafficking statement for the financial year ending 31 December 2025.

Amber is part of Boyd Watterson Global Asset Management Group LLC (**Boyd**), a global diversified infrastructure, real estate and fixed income business with over \$36 billion in assets under management and over 300 employees with offices in eight US cities and twelve countries.

Amber itself is a specialist international investment manager focused on investment, asset management and fund management. Amber currently manages or advises nine funds and managed accounts (two listed and seven private) with £4.8 billion (\$6.4 billion) in funds under management. With a presence across 12 countries, Amber manages over 200 infrastructure investments representing total assets under management ('AUM') of £14.5 billion (\$19.6 billion) as at 31 December 2025. Amber's core business focuses on managing infrastructure assets across the public, transport, energy, digital and demographic infrastructure sectors internationally. Amber is headquartered in London with offices in Europe, North America, Australia and New Zealand.

Amber is committed to ensuring there is transparency in its approach to tackling modern slavery throughout its supply chains. Our commitment to protecting human rights is outlined in our Anti-Slavery and Human Trafficking Policy, published on the Amber website, which applies to all companies in the Amber Group. Amber aims to foster a culture of honesty, integrity, ethical behaviour and good corporate governance.

### Steps taken in 2025

Amber has taken the following steps in 2025 which reflects our commitment to continuous improvement and the prevention of slavery and human trafficking in our business. In the year ending 31 December 2025, we have:

- enhanced the Business Integrity Questionnaire for completion by co-investors, JV partners and investee companies as part of our investment and onboarding diligence process and created a bespoke version for a higher risk jurisdiction alongside the enhancement of Business Integrity Frameworks. The Questionnaire requires confirmations in relation to anti-financial crime, including sanctions, PEPs, anti-bribery and anti-corruption, conduct, modern slavery, human trafficking and internal controls;
- continued to follow our supplier diligence, investment diligence and onboarding processes, utilising the automated screening system. The system enables initial and ongoing screening against global sources for any identified involvement in i) forced and slave labour, ii) human rights violations and iii) human trafficking;
- conducted a periodic review of Amber's anti-financial crime policies and related procedures, checklists and guides including the rollout of a new Amber Sanctions Guide to incorporate the enhanced screening process carried out including against global human rights sanctions regimes. Comprehensive updates were also made to Amber's Anti-Bribery & Anti-Corruption Policy as well as Amber's Outside Business Activities Policy, with enhanced disclosure and approval forms;
- continued to ensure all our procurement strategies and contract terms and conditions include appropriate references to modern slavery and human trafficking; and
- provided ongoing mandatory training and communications to embed our values of being a responsible business which operates ethically and with integrity.

We also uploaded our Modern Slavery and Human Trafficking Transparency Statement, for the financial year ending 31 December 2024, to the Home Office's Modern Slavery Statement Registry.

### Ethos

Amber is committed to acting ethically and with integrity in all its business dealings and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the business or supply chains. Amber actively promotes and encourages ethical behaviour through its Code of Conduct which is available to all staff on Amber's intranet and is committed to supporting best practice in responsible investment.

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## Policies and Training

Amber's Anti-Slavery and Human Trafficking Policy is available on Amber's website.

Amber's Employee Handbook clearly sets out the business' expectations regarding modern slavery and human trafficking and directs employees to the Whistleblowing Policy should any employee have any concerns. This procedure aims to ensure that everyone in the business is confident they can raise their reasonably held concerns without fear of reprisal or detrimental treatment. It is underpinned by Amber's Code of Conduct, Know your Supplier processes and including slavery checks as part of our diligence process. Amber requires all employees to complete training which covers the topic of modern slavery. A record of employees' training is maintained for audit purposes.

Amber also operates an Environmental, Social and Governance Policy which looks beyond legislative and regulatory requirements to promote best practice and continual improvement in environmental management and social responsibility.

## Key suppliers

Amber has continued to undertake a risk-based approach to working with its suppliers and due diligence is carried out on Amber's key partners and suppliers to identify risk regarding modern slavery.

We have continued to assess our supply contracts by size and risk profile as part of our existing procurement processes and to consider the risk of slavery or trafficking being present. To date, we have not discovered any modern slavery in our supply chains.

Amber includes "compliance with law" obligations in its supply contracts and, as far as possible, relevant warranties and undertakings to ensure that our suppliers hold their own suppliers to the same standard. A supplier's violation of the Anti-Slavery and Human Trafficking Policy may result in termination of our relationship with the supplier.

## Reporting

Our Anti-Slavery and Human Trafficking Policy requires anyone who becomes aware of, or suspects, modern slavery in our business or supply chains to report it to Amber's MSA Compliance Officer or, if they wish to report anonymously, they may do so as set out in Amber's Whistleblowing Policy.

An employee's violation of the Anti-Slavery and Human Trafficking Policy may result in a disciplinary procedure, up to and including, dismissal. As a result of taking the above steps for the year ended 31 December 2025, no breaches of the modern slavery legislation by our suppliers have been reported to us or have otherwise come to our attention.

## Review

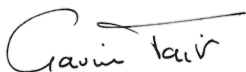
We will continue to review and develop our supply chain due diligence process and update our risk assessment to ensure a robust and consistent approach to supply chain risks. We will continue to make efforts to identify any significant risks in our business and supply chain and implement any necessary actions directly with suppliers. Specific activities identified for 2026 include:

- as a result of our integration with Boyd and as our business expands in geography and into new sectors, we will update our processes, policies and procedures as required to effectively counter modern slavery; and
- continuing to build on our active asset management of operational companies within our advised funds to aid them in managing the risk of modern slavery in their business.

## Approval

This Modern Slavery and Human Trafficking Transparency Statement has been approved by the relevant Boards and shall be updated annually.

Signed for and on behalf of Amber by:



Gavin Tait  
CEO, Amber Infrastructure Limited

16 April 2026