
AMBER INFRASTRUCTURE GROUP'S ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

In the context of this policy, "Amber" should be taken to mean Amber Infrastructure Group Limited, its subsidiary companies, and the corporate groups of the investment funds it operates, being International Public Partnerships Limited, the Scottish Partnership for Regeneration in Urban Centres, the London Energy Efficiency Fund, the National Digital Infrastructure Fund and the Mayor of London's Energy Efficiency Fund.

SUMMARY

Modern slavery is a violation of fundamental human rights and is a criminal offence under the Modern Slavery Act 2015 (the Act). It takes various forms, including servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This document sets out the Group's policy with the aim of the prevention of opportunities for modern slavery to occur within the Group's businesses or supply chains. This policy's use of the term "modern slavery" has the same meaning as in the Act.

COMMITMENT AND POLICY

Amber is committed to acting ethically and with integrity in all our business dealings and relationships. Amber is confident that modern slavery is not taking place in its own business and is committed to taking steps to ensure modern slavery is not taking place in any of its supply chains. Amber has a zero tolerance approach to modern slavery. If Amber discovered that one of its suppliers was accepting of modern slavery in its business or supply chain it would seek to terminate its arrangement with that supplier at the earliest opportunity.

APPLICATION OF POLICY

This policy applies to all persons working for Amber, including employees at all levels, officers, directors, consultants and temporary workers. Amber will ensure that all of its direct suppliers are aware of this policy.

This policy does not form part of any employee's contract of employment and may be amended at any time.

RESPONSIBILITY FOR THE POLICY

The MSA Compliance Officer has primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries regarding the policy, and auditing internal control systems and procedures to ensure they are as effective in countering modern slavery as possible, and they report directly to the Amber Infrastructure Limited board of directors in this regard.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and where appropriate are given adequate training on the issue of modern slavery in supply chains.

All persons to which this policy applies are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the MSA Compliance Officer.

COMPLIANCE WITH THE POLICY

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the MSA Compliance Officer as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the MSA Compliance Officer.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the MSA Compliance Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found at Section 5.7 of the Employee Handbook.

TRAINING

Training on this policy, and on the risk our business faces from modern slavery in its supply chains will be provided as necessary to individuals that work for us.

Our approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

BREACHES OF THIS POLICY

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.