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## Modern Slavery and Human Trafficking Transparency Statement - 2021

This statement is published on behalf of Amber Infrastructure Group Holdings Limited and Amber Infrastructure 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 2020.

Amber Infrastructure Group Holdings Limited is the ultimate controlling party of the Amber business whose principal activity in the year under review was that of an operating company of a wider group (the **Amber Group**) involved in the provision of financial advisory, origination, development, and asset and fund management services within the infrastructure sector. The Amber Group has its head office in London with satellite offices in Australia, Europe and North America. The Amber Group develops and manages infrastructure projects in the UK, Australia, North America and across Europe.

Amber is committed to ensuring there is transparency in its approach to tackling modern slavery throughout 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.

### Steps taken in 2020

Amber has taken a number of notable steps in 2020 which reflects our commitment to the prevention of slavery and human trafficking in our business. Despite the restrictions associated with COVID-19, we were able to continue our activities to identify and address risks of modern slavery in our operations and supply chains. Amber believes the best way to support communities and maintain the business's role as a responsible investor and manager, has been to (i) focus on the business's strengths, (ii) operate in line with investor expectations, and (iii) be flexible within the boundaries of agreed contracts.

Throughout the year, we worked hard to adapt our working environments and conditions with Amber staff working from home in line with the prevailing government guidance. We worked with our key suppliers where appropriate to ensure our approaches were aligned and robust – this included knowledge sharing and supporting certain suppliers with their own processes.

Following the expiry of the Brexit transition period, Amber revisited its recruitment and onboarding processes. As always, proof of eligibility to work in the UK must be provided before the engagement starts and in 2020, Amber Infrastructure Limited obtained its sponsorship licence in order to hire candidates from outside the UK.

As part of our risk assessment and process audit in Australia, information requests regarding modern slavery were circulated to the business's suppliers deemed higher risk in the region. As well as a copy of the suppliers' own modern slavery statements, we sought more granular information regarding the suppliers' own supply chains, their actions to address any modern slavery risks identified in their business and what metrics they use to assesses the effectiveness of such actions.

Amber is committed to challenging discrimination, harassment and victimisation or any conduct prohibited by the Equality Act 2010. To this end, the organisation established a new Diversity & Inclusion committee who are specifically mandated to identify and effect key initiatives within the business to promote diversity and inclusions. It is anticipated that in 2021, this will include introducing a training module on "unconscious bias" to enable staff to have a better understanding and cultural awareness.

We also uploaded our Modern Slavery and Human Trafficking Transparency Statement, for the financial year ending 31 December 2020, to the Home Office's Government 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 behavior through its Code of Conduct which is available to all staff on the Company's intranet and is committed to supporting best practice in responsible investment. In 2020, Amber published its inaugural Sustainability Report which is publicly available on the Amber website.

### Policies and Training

Amber approved an Anti-Slavery and Human Trafficking Policy in 2017, which is regularly reviewed and can be found on the Amber website.

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Amber's Employee Handbook clearly sets out the business's expectations with regards to modern slavery and human trafficking and directs employees to the Whistleblowing Policy should any employee have any concerns. The aim of this procedure is to ensure that everyone in the business is confident they can raise their reasonably held concerns without fear of reprisal or detrimental treatment.

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**

In addition to the recent supplier audit discussed above in Australia, over the last year 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 any 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.

We acknowledge that the COVID-19 pandemic has brought challenges that could have increased the risk of modern slavery in our supply chains. However, we have continued to work closely with our key suppliers throughout the year to ensure our assets serve their communities most productively. Through this close engagement with our suppliers and stakeholders, we do not consider this increased risk has impacted any of 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 as noted above. An employee's violation of the Anti-Slavery and Human Trafficking Policy may result in discipline, up to and including, dismissal.

### **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 all efforts to identify any significant risks in our business and supply chain and implement any necessary actions directly with suppliers. Specific activities identified for 2021 include:

- as our business expands in geography, to take account of any changes or new processes required to effectively counter modern slavery;
- to audit internal control systems and internal procedures to ensure they are effective in countering modern slavery; and
- to further engage with our supply chain on higher risk projects to develop a better understanding of how they are managing the risk of modern slavery.

### **Approval**

This Modern Slavery and Human Trafficking Transparency Statement has been approved by the Board of Amber and shall be updated annually.

Signed for and on behalf of Amber by:



Gavin Tait  
CEO, Amber Infrastructure Limited  
19 March 2021