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## Modern Slavery and Human Trafficking Transparency Statement- 2024

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 2023.

Amber Infrastructure Group Holdings Limited is the UK parent company 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, New Zealand, Europe and North America. The Amber Group develops and manages infrastructure projects in the UK, Australia, New Zealand, North America and across Europe.

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 2023

Amber has taken the following steps in 2023 which reflects our commitment to continuous improvement and the prevention of slavery and human trafficking in our business. In the year ending 31 December 2023, we have:

- enhanced our supplier diligence, investment diligence and onboarding process to utilise an automated screening system. The system enables initial and ongoing screening against global sources for any identified involvement in:
  - *Forced and Slave Labour*; screens persons or entities accused of, investigated or arrested for, charged with or convicted of crimes involving slavery, servitude, forced or compulsory labour.
  - *Human Rights Violations*; including controversies, sanctions, penalties, fines from lost court cases, settlements or cases not yet settled related to human rights violations associated with an entity or person, such as human rights violations, indigenous people, land grabbing, or land rights violations.
  - *Human Trafficking*; screens persons or entities accused of, investigated or arrested for, charged with or convicted of crimes involving human trafficking.
- introduced a web-based software for management of compliance obligations, including modern slavery legislation in the UK and Australia;
- aided operational companies within our advised funds to aid enhanced diligence in relation to forced labour risks in the solar sector;
- continued to ensure all our procurement strategies and contract terms and conditions include appropriate references to modern slavery and human trafficking; and
- provided ongoing 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 2022, 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 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. In 2023, Amber published its annual Sustainability Report which is publicly available on the Amber website.

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## Policies and Training

Amber's Anti-Slavery and Human Trafficking Policy (2017) is regularly reviewed and 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 titled "Human Rights Training" which covers modern slavery training. 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 2023, 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 2024 include:

- as our business expands in geography, taking account of any changes or new processes required to effectively counter modern slavery; and
- continuing to build on our active asset management of operational companies within our advised funds to understand how they are complying with their modern slavery act obligations and the risk of modern slavery more generally.

## Approval

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

Signed for and on behalf of Amber by:



Gavin Tait  
CEO, Amber Infrastructure Limited

18 April 2024