

Modern Slavery and Human Trafficking Transparency Statement- 2020

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 2019.

Amber Infrastructure Group Holdings Limited is the ultimate controlling party of Amber and the principal activity of Amber in the year under review was that of an operating company that is part of a wider group (the **Amber Group**) involved in the provision of financial advisory, origination and development, and asset and fund management services within the infrastructure sector. The Amber Group has its head office in London and has satellite offices in Scotland, Australia, Germany and North America. The Amber Group develops and manages infrastructure projects in the U.K., Australia, Canada, Germany, France, Italy, Belgium and Ireland and is also undertaking development activities in the United States.

Amber is committed to ensuring there is transparency in the business and in the 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 2019

Amber has taken several steps in 2019, reflecting our commitment to the prevention of slavery and human trafficking in our business.

We have updated our employee training on modern slavery by expanding the content of our training module to cover wider human rights issues. We have also updated our Whistleblowing Policy to encourage a transparent working environment where employees feel able to voice their concerns, including around modern slavery issues.

Amber's Head of Sustainability has strengthened supply chain due diligence and internal reporting, and we have carried out checks to confirm that Amber's higher risk suppliers have published a policy or statement on modern slavery. The internal investment approvals process has been updated to ensure that ESG factors are comprehensively reported in any due diligence papers.

We also uploaded our Modern Slavery and Human Trafficking Transparency Statement, for the financial year ending 31 December 2019, to the Modern Slavery Registry.

Amber's Legal team have also sought to procure appropriate anti-slavery and human rights obligations in any new supplier contracts, and they have also been working with the Australian office regarding modern slavery legislation in Australia.

Ethos

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

In August 2019, Amber became a signatory to the United Nations-supported Principles for Responsible Investment. This has led to a review of all Amber's investment processes and policies to ensure that environmental, social and corporate governance aspects were strengthened all the way through the

investment cycle – including increased requirements for new suppliers and contractors. In addition, Amber has established a Corporate Social Responsibility Committee and strategy for 2020, outlining how Amber is going support its communities, reduce impact on the environment, drive health and wellbeing and support charities.

Policies and Training

Amber approved an Anti-Slavery and Human Trafficking Policy in 2017, which can be found on our website. Amber's Employee Handbook clearly sets out the businesses' expectations with regards to modern slavery and human trafficking and directs employees to the Whistleblowing Policy should any employee have any concerns. Amber's training programme on modern slavery was also updated in 2019 as planned in last year's Transparency Statement.

Key suppliers

We have reviewed the Modern Slavery Act risk assessment, identifying new areas of potential risk for modern slavery as the business areas the Amber Group is involved in has developed over 2019.

Over the last year, Amber has undertaken 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. 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

Amber maintains a robust process for reporting slavery and human trafficking. The Anti-Slavery and Human Trafficking Policy outlines the reporting obligations and employees are encouraged to report any suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. We also have in place a policy to protect whistleblowers who highlight to us any risk of slavery or human trafficking within our business. 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 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 2020 include:

- working with our newly appointed Compliance Officer to update our modern slavery compliance programme, including updating our "Know Your Supplier" process;
- work with our Australian office on developments in Australian modern slavery legislation;
- auditing internal control systems and internal procedures to ensure they are effective in countering modern slavery; and
- further engaging with our supply chain on higher risk projects to develop a better understanding of how they are managing the risk of modern slavery, including using our review meetings with key suppliers to spot check and discuss their processes to prevent 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

9 March 2020