
Modern Slavery and Human Trafficking Transparency Statement- 2022

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 2021.

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 2021

Amber has taken a number of notable steps in 2021 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.

In the year ending 31 December 2021, we have:

- reviewed our modern slavery risk mapping across our supply chain, ensuring that any suppliers or supply chains which are risk-assessed as being potentially higher risk for Modern Slavery are identified;
- ensured all our procurement strategies and contract terms and conditions include reference to modern slavery and human trafficking, where applicable; and
- continued to embed our values of being a responsible business which operates ethically and with integrity through ongoing training and communications.

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 2021, Amber published its annual 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.

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. This is then underpinned by Amber's Code of Conduct, Know your Supplier processes and including slavery checks as part of our customary bribery checks. 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 has in place a training module entitled "Human Rights Training" which all employees must complete and 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 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 continued to present 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 s noted above. An employee's violation of the Anti-Slavery and Human Trafficking Policy may result in discipline, up to and including, dismissal. As a result of taking the above steps for the year ended 30 December 2021, 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 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 2022 include:

- as our business expands in geography, to take account of any changes or new processes required to effectively counter modern slavery;
- to consider in conjunction with the Head of Sustainability whether to publish a Transparency Statement alongside planned ESG disclosures on for funds managed by Amber;
- 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;
- 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 of Amber and shall be updated annually.

Signed for and on behalf of Amber by:



Gavin Tait
CEO, Amber Infrastructure Limited

4 March 2022