
Modern Slavery and Human Trafficking Transparency Statement- 2023

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 2022.

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, 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. Amber aims to foster a culture of honesty, integrity, ethical behaviour and good corporate governance.

Steps taken in 2022

Amber has taken a number of notable steps in 2022 which reflects our commitment to the prevention of slavery and human trafficking in our business. In the year ending 31 December 2022, 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;
- enhanced consideration of forced labour risks through the investment process by working with technical advisers to consider emerging intelligence, including in relation to Uyghur forced labour and our solar investments;
- updated our Whistleblowing Policy and processes to aid anonymous reporting of suspicion of criminal or unethical issues such as violations of human rights. As part of the updated process Amber has engaged Deloitte to supplement our internal reporting lines with an external, independent 24/7 whistleblowing reporting platform;
- continued to ensure all our procurement strategies and contract terms and conditions include reference to modern slavery and human trafficking, where appropriate; 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 2021, 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 2022, 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 business' 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 diligence process. 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 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 2022, 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 2023 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 for funds managed by Amber;
- re-conduct our monitoring processes with our supply chain on higher risk projects to develop a better understanding of how they are managing the risk of modern slavery; and
- 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

25 April 2023