

Modern Slavery and Human Trafficking Transparency Statement - 2019

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 2018.

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, development, structuring and asset and fund management services within the infrastructure sector. The Amber Group has its head office in London and has satellite offices in Australia, Germany and North America. The Amber Group develops and manages infrastructure projects in the UK, Australia, Canada, Germany, France, Italy, Belgium and Ireland.

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 which applies to all companies in the Amber Group.

Steps taken in 2018

Responsible business is something that Amber takes seriously, and further investment has been made in 2018 by rolling out a global online portal for compliance training and by appointing a new Head of Sustainability.

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 a Sustainability Policy which looks beyond legislative and regulatory requirements to promote best practice and continual improvement in environmental management and social responsibility.

Amber also has an appointed MSA Compliance Officer with primary responsibility for implementing the Anti-Slavery and Human Trafficking Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Policies and Training

Amber approved an Anti-Slavery and Human Trafficking Policy in 2017, which can be found on our website. We have also conducted a review of our policies and procedures which are relevant in the context of the Act and updated our Code of Conduct. 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 in relation to compliance with these expectations by Amber or any of its suppliers.

Training on the Anti-Slavery and Human Trafficking Policy, and on the risk our business faces from modern slavery in its supply chains is provided as necessary to individuals that work for us.

Key suppliers

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 risk assessment across our offices 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 actions appropriate or necessary directly with suppliers. Specific activities identified for 2019 include;

- review the Modern Slavery Act risk assessment, identifying any new areas of potential risk for modern slavery as the business areas the Amber Group is involved in continues to develop;
- review of our active suppliers to identify which have published a policy or statement on modern slavery;
- for areas of higher risk, we will engage with our supply chain to develop a better understanding of how they are managing the risk and where they need support;
- take steps to gain assurance of our supply chains human rights standards, including development of audit strategies and protocols;
- further develop compliance training for employees, reflecting our commitment to the prevention of slavery and human trafficking; and
- assessment and strengthening of slavery and human rights obligations in supplier contracts.

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:



Giles Frost
CEO, Amber Infrastructure Limited

8 March 2019