

Statement on steps taken to prevent modern slavery and human trafficking in the InfraRed Group

Scope of statement

This statement is made pursuant to the UK's Modern Slavery Act 2015 and Australia's Modern Slavery Act 2018, having been agreed by the following (referred to collectively as "InfraRed"):

- InfraRed Capital Partners (Management) LLP
- InfraRed Partners LLP
- InfraRed Capital Partners Ltd

InfraRed is an investment manager to a range of private and listed investment funds focused on infrastructure and real estate, and the statement is made in respect of this business and its supply chains. These supply chains include all those providing goods and services to InfraRed, e.g. professional advisors undertaking due diligence work for InfraRed Capital Partners Ltd in its capacity as manager of certain funds.

Introduction from the Deputy CEO

InfraRed takes its corporate responsibilities seriously: to its investors, its partners, its employees and the wider community.

We have no tolerance whatsoever for slavery or human trafficking in any part of our business or supply chains. We are committed to taking all necessary steps to maintain our zero tolerance approach.

Risk assessment and steps taken

InfraRed has assessed the risk it faces in its own business and in the supply chains described above. It believes it faces only a low risk of involvement in slavery or human trafficking, based on the limited range of goods and services forming its supply chains, the territories in which it is active, and a clean track record. However, it remains mindful that suppliers and lines of business can change.

InfraRed has extended its risk assessment to the funds in respect of which it acts as investment manager, where it assesses a relatively higher risk. This risk arises in relation to infrastructure and real estate projects where InfraRed acts on behalf of the relevant investment fund to engage contractors for development works, facilities management, capital expenditure plans and other objectives. InfraRed appreciates that the sectors of construction and facilities management are at risk of modern slavery in the UK and elsewhere. For example, the UK's Chartered Institute of Building has noted problems in that sector, especially in relation to migrant labour. In light of this risk, InfraRed has taken the following steps:

Policy

- InfraRed has long adopted a policy on Environmental, Social and Governance ("ESG") that it considers to include the topic of modern slavery and human trafficking.
- Individuals working at InfraRed are encouraged to report breaches of policy, malpractice or other concerns, and can make disclosures to InfraRed's Deputy CEO under its whistleblowing policy.
- As a signatory to the Principles for Responsible Investment, InfraRed has been committed to including relevant issues such as working conditions, slavery and child labour into investment analysis, decision-making and ownership practices.

Procurement

- InfraRed operates a global procurement policy which requires a risk analysis for all new suppliers, to include ESG factors and a check on negative publicity. A representation or warranty on the topic of modern slavery and human trafficking is not mandatory but one can be requested if appropriate, e.g. if a supplier has a track record of issues.

- InfraRed generally requires all counterparties and managed service providers to abide by local law and regulation on topics like recruitment (e.g. checking right to work), labour standards and health & safety; these obligations extend to project sub-contractors. Contractors have strict duties to report immediately on material health & safety matters including modern slavery and human trafficking.

Practice

- InfraRed monitors the risk it faces from modern slavery and human trafficking. Where it perceives an increase in its risk profile, it takes appropriate responsive action to analyse and control the risk.
- For example, InfraRed is involved in infrastructure developments in Colombia, a country that faces an increased risk of forced labour and modern slavery as a consequence of the civil unrest in neighbouring Venezuela and resultant migration; InfraRed has received assurances from relevant project boards of management and counterparties.

Monitoring the effectiveness of actions

The policies noted above are part of InfraRed's global policies, publicised in line with the values of the business and subject to annual attestation by all partners and individuals.


InfraRed maintains an operational risk and internal controls framework to control and monitor the risks it faces. The subject matter of this statement is included in InfraRed's definition of operational risk, meaning any material risk, near-miss events or actual incidents must be escalated and assessed in a structured way to a central risk management function. Corrective actions would be put in place to reflect the firm's zero tolerance risk appetite, including by replacing or working with suppliers. Such actions would then be monitored and reported as part of the wider risk management framework.

All of the main infrastructure project managers are required to attest annually that they have not experienced any issues in relation to modern slavery.

InfraRed will continue to assess industry best practice.

Approved by InfraRed Capital Partners (Management) LLP

Signed by

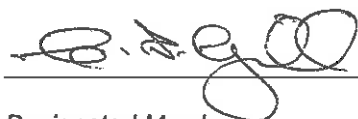


Designated Member

Dated: 21 FEBRUARY 2019

Approved by InfraRed Partners LLP

Signed by



Designated Member

Dated: 21 FEBRUARY 2019

Approved by the Board of InfraRed Capital Partners Limited

Signed by 
Designated Director

Dated: 21 FEBRUARY 2019