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HICL Infrastructure Company Limited

Modern Slavery Act Transparency Statement

HICL Infrastructure Company Limited (“HICL” or “the Company”) is a long-term investor in public infrastructure. HICL has an Environmental, Social and Governance (“ESG”) policy which applies both to making new investments and the management of the current portfolio.

Policy

InfraRed Capital Partners Limited (“IRCP”) acts as Investment Adviser to HICL. IRCP is a signatory to the to the Principles for Responsible Investment (the “Principles”), formerly known as the United Nations Principles for Responsible Investment, which are widely recognised and regarded around the world. The principles can be summarised as follows:

- To incorporate ESG checks into investment analysis and decision-making;
- To be active owners and incorporate ESG controls into ownership policies and practices;
- To seek appropriate disclosures on ESG issues by the entities in which the investments are made;
- To promote acceptance and implementation of the Principles within the investment industry; and
- To report on activities and progress towards implementing the Principles.

HICL’s ESG policy includes a focus on compliance with employment law, health and safety and human rights. The Board and IRCP have a zero tolerance policy towards slavery, human trafficking and forced labour of any type in respect of the HICL Group, and the companies in which the Group holds an investment, and the Company’s supply chain.

Structure and supply chain

As is typical for an investment company, HICL does not directly employ staff. The application of the Modern Slavery Act is therefore most relevant to the companies in HICL’s supply chains and to IRCP. The Board and IRCP recognise the Company’s responsibilities to society in relation to HICL’s supply chain (both to the HICL Group and to the companies in which it invests), and processes are in place, working in collaboration with the management teams of portfolio companies, which seek to ensure that suppliers share the Company’s values and comply with relevant legislation.

Due diligence processes and risk assessment

IRCP’s Infrastructure team is responsible for conducting due diligence to review prospective acquisitions against HICL’s ESG policy. In relation to HICL’s portfolio of infrastructure investments, IRCP actively

implements good ESG and risk management practices by being a “pro-active” owner of the Group’s investments, including monitoring companies providing operational services to portfolio investments. In this capacity, IRCP reports directly to the Board, and is required to escalate any material breaches of ESG policy. IRCP maintains its own ESG and risk management policies and procedures, and conducts staff training as required.

Measuring effectiveness

HICL’s Annual Report contains further detail on the implementation of the Company’s ESG policy, including detail on how governance structures enable directors appointed by IRCP to monitor actively compliance on the part of the managers of HICL’s underlying investments.

In particular, the Investment Adviser undertakes an annual audit to ensure that each key contractor (or its wider group) has appropriate ESG policies in place, that these are being adhered to in the delivery of the services to the project and that there have been no material breaches.

Approval

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes HICL’s current modern slavery and human trafficking statement. This statement was approved by the Board of Directors on 26 February 2019. It will be reviewed again in 2020.



Ian Russell

Chairman

20 March 2019