

HICL Infrastructure Company Limited

Modern Slavery Act Transparency Statement

HICL Infrastructure Company Limited (“HICL”) 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.

We will not tolerate human trafficking, slavery or forced labour of any type. HICL’s ESG policy includes a focus on compliance with employment law, health and safety and human rights, and includes 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.

We recognise our responsibilities to society in relation to our supply chain (both to the HICL Group and the companies in which we invest), and we (being the Board of HICL or InfraRed Capital Partners Limited as appropriate) have in place processes which seek to ensure that our suppliers share our values and comply with relevant legislation. In collaboration with the management teams of our portfolio companies, we have established review procedures to monitor this compliance.

Application of policy

InfraRed Capital Partners Limited (“IRCP”) acts as Investment Adviser to HICL. 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 practices by being a “pro-active” owner of the Group’s investments, including monitoring the main companies operating the portfolio assets. In this capacity, IRCP reports directly to the Board, and is required to escalate any material breaches of ESG policy.

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 Environmental, Social and Governance (“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
- To report on activities and progress towards implementing the Principles

Further detail on steps taken and the wider governance framework

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 their 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.

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. It will be reviewed again in 2019.