

ACTIS MODERN
SLAVERY ACT
STATEMENT
2023

INTRODUCTION

This statement is issued on behalf of Actis LLP, Actis GP LLP and their subsidiaries operating and established in the United Kingdom (together "Actis" "Our" or "We") pursuant to Section 54 of the Modern Slavery Act 2015 (the "Act") in respect of the financial year ending on 31 December 2022. Actis LLP and Actis GP LLP are regulated by the Financial Conduct Authority in the UK.

At Actis, we are committed to promoting world-class standards in environmental protection, climate change mitigation, social issues and human capital, health and safety, and business integrity (including sound corporate governance and transparent accounting). This includes taking all reasonable steps to eliminate the risk of slavery and human trafficking in any part of our business or primary supply chain.

MODERN SLAVERY

Modern slavery generally encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment. We do not support and are not aware of any dealings with any business which is involved in modern slavery and we will not knowingly work with any party who we suspect is connected with any such conduct or behaviour. Nonetheless we recognise the heightened risk of becoming involved with modern slavery in some of the countries where Actis has a presence and where we invest, primarily where we engage with contractors or third party service providers.

OUR BUSINESS

We are a leading global investor in sustainable infrastructure. We deliver competitive returns for institutional investors and measurable positive impact for the countries, cities, and communities in which we operate. Our global experience, operational knowhow and strong culture allow us to create global sustainability leaders. We invest behind global themes with a focus on Energy Infrastructure, Long Life Infrastructure, Digital Infrastructure and Real Estate. We do it at scale, and have been doing so for decades. Since inception, we have raised US\$25 billion to invest for a better tomorrow.

We are a signatory to the United Nations backed Principles for Responsible Investment (UNPRI), an investor initiative developed by the UNEP FI and the UN Global Compact. We have consistently been awarded the highest rating score in the UN Principles for Responsible Investment (PRI) independent assessment.

How we conduct ourselves is based on a set of values which we have adopted as an organisation, and our policies are underpinned by them:

- Accountability
- Collaboration
- Transparency
- Inclusion
- Sustainability

OUR RESPONSIBLE INVESTMENT APPROACH

We aim to ensure that civic society, our investors, our employees and the wider community all benefit from our investment activities as we work to build successful sustainable businesses. Across all of our investment sectors, we are committed to promoting world-class standards in health and safety, environmental protection, social engagement and business integrity – as well as sound corporate governance and transparent accounting. This commitment manifests itself through:

- Our full-time, in-house team of sustainability professionals.

- Our determination to improve ESG and sustainability outcomes for all our portfolio companies.
- The integration of ESG into all our investment decisions and at all stages of the investment cycle.
- The application of our proprietary frameworks to better understand climate-related transition risk (Transition Tool) and positive impact (Actis Impact Score).

Our approach to sustainability is underpinned by rigorous environmental, social and governance (ESG) guidelines, codified in our Responsible Investment and Sustainability Policy. As part of this approach we also recognise the importance of engaging with our business partners to encourage them to adopt such standards. We expect them to understand and share our commitment to integrating the management of those standards and practices into their business processes. This includes responsible supply chain management processes.

Actis has been a signatory to the UN-supported Principles for Responsible Investment (PRI) since 2009, and has reported publicly to the PRI since 2010. Since 2015 when PRI launched a Reporting and Assessment process to measure signatories' ESG activities and reporting frameworks, Actis has achieved an A+ rating.

Our responsible investment (RI) approach means that across all sectors we actively seek opportunities to create long term, sustainable value. We integrate an assessment of Environmental, Social and Governance (ESG) standards into our investment decision making (see our Responsible Investment and Sustainability Policy – [here](#)). This approach means that:

- before making an investment, our due diligence review will consider the operational risks of the relevant business (which will include an assessment of supply chain risk where relevant); and
- post investment, we seek to apply international best practice in ESG standards across our portfolio, in addition to complying with the local regulatory environment.

OUR SOCIAL IMPACT AND HUMAN CAPITAL POLICY

The objective of our Social Impact and Human Capital policy is to safeguard the rights, dignity and health and safety of any person who has dealings with Actis or the businesses in which we invest. This includes:

- treating all our employees fairly and to respect their dignity, well-being and diversity;
- requiring the businesses in which we invest to treat their employees fairly in terms of recruitment, progression, terms and conditions of work and representation, without prejudice to and irrespective of gender, race, colour, disability, political opinion, sexual orientation, age, religion, or social or ethnic origin;
- requiring the businesses in which we invest to take account of their impact on employees, contractors, the local community and other stakeholders affected by their operations (through appropriate consultation, and through an assessment of social impacts in cases involving resettlement, cultural property, indigenous peoples, migrant labour or other issues where the negative social impact could be significant) and to take steps to mitigate any risks;
- working towards the compliance of our investments with the International Labour Organisation Fundamental Conventions, the UN Guiding Principles on Business and Human Rights, IFC Performance Standard 2: Labour and Working Conditions, and Voluntary Principles on Security and Human Rights; and
- complying with the Act.

In addition, our policy is to invest only in businesses which do not:

- employ forced labour of any kind, either directly or via their primary supply chain; or
- engage in or support any practices relating to slavery, forced or compulsory labour or human trafficking; or
- allow children below the minimum age¹ to form part of their workforce (either directly or via their primary supply chain); or
- allow any worker under the age of 18 to undertake hazardous work.

¹ The “minimum age” is the higher of (i) 14 years of age or (ii) the minimum age of employment permitted by the law of the country where the employment takes place or (iii) the age established for completing compulsory education in that country. This may reference the International Labour Organization (ILO) standards, through the applicable ILO Conventions / Protocols ratified by the country, or guiding recommendations such as ILO Convention No. 138 and its Recommendation No. 146, and ILO Convention No. 182 and Recommendation No. 190.

OUR SUPPLY CHAIN

A supply chain is a system of organisations, people and activities to bring a product or service from inception to the sale and delivery of such product or service to the end user. As a manager of alternative investment funds, our supply chain is relatively short, and is comprised of predominantly professional and business service providers. As the relationship between (i) a fund (and its manager) and (ii) a portfolio company is one of investor to investee, and not a relationship based on the supply of goods or services, our investment portfolio does not form part of our supply chain. Similarly, our non-UK offices fall outside the ambit of the Act.

However, our responsible investment approach means that we are equally committed to address the risk of modern slavery and to eliminate its existence, regardless of whether it arises in our own operations or in our investments.

OUR OWN OPERATIONS

We undertake a risk assessment as to whether our contractors and third party service providers (“suppliers”) are likely to be affected by modern slavery and this includes considering the type of business in question and the location from which the relevant service is provided. We manage the risk of such suppliers having an involvement with modern slavery through a number of mitigating controls including:

- due diligence and referencing of the relevant parties prior to their engagement;
- a risk assessment of suppliers to determine whether specific and bespoke due diligence measures are appropriate (e.g. site visits or agreeing with certain suppliers what mitigating steps are required);
- a clear statement being made available to relevant third parties as to what we expect with respect to any connection with modern slavery (and our zero tolerance approach);
- ongoing monitoring of any material change in the risk associated with a particular supplier (which may result in specific actions being implemented e.g. ceasing to use an existing supplier); and
- the use of counter parties who we believe to be reputable.

OUR INVESTMENTS

Prior to pursuing all potential investments, we undertake extensive due diligence on all targets, which extends to a review of the operational risks which may arise in a business and its supply chain. This covers the entire ESG spectrum and, where appropriate, includes carrying out specialist due diligence on human rights, modern slavery and human trafficking concerns or issues. Our approach to due diligence aligns with international best practice, including:

- IFC Performance Standards
 - 2 (Labour and Working Conditions),
 - 4 (Community Health, Safety, and Security) and
 - 7 (Indigenous Peoples)
- The UN Guiding Principles on Business and Human Rights
- The Voluntary Principles on Security and Human Rights

Once we invest, for those companies whose operations may give rise to a potential risk of modern slavery in their supply chains, our Sustainability and deal teams work closely with management to strengthen and improve systems and controls to mitigate this risk. This would include, for example, ensuring that a robust responsible sourcing policy and programme is in place (and providing guidance materials on matters such as the use of security services), providing quantitative and qualitative metrics (including on modern slavery), board and sub-committee oversight, and routine annual and quarterly reporting.

For each of our investments, we request that management/our business partners sign up to an ESG undertaking as part of the shareholders agreement. Whilst this has always referred to fair treatment of employees with respect to remuneration and conditions of employment, in 2017 this was enhanced to include a reference to ensuring that

modern slavery does not take place within the business and its operations, including its primary supply chain. Our investee companies are also required to notify us immediately of any serious social incident issue.

OUR POLICIES

We have always had a zero-tolerance approach to modern slavery across our business. With respect to our own operations our Supplier Code of Conduct ([here](#)) clearly sets out (i) the standards our suppliers are expected to adopt in relation to managing their business operations, including their primary supply chain and (ii) the sanctions for breach of that Code. With respect to our investments, the Social Impact and Human Capital section in our Responsible Investment and Sustainability Policy ([here](#)) makes specific reference to forced and child labour, supply chain risk and appropriate labour practices.

In the event that we became aware of a heightened risk of modern slavery with respect to our own operations or any investment in our portfolio, then we would require the development of a clearly articulated action plan as to how that risk was to be addressed and eliminated. In all such scenarios our objective would be to have a zero tolerance of any form of modern slavery.

OUR ONGOING COMMITMENT

In 2023, we will further strengthen our approach to managing modern slavery risk through the following activities:

- By continuing to raise the awareness and understanding of modern slavery and its effects, by facilitating real time training for our staff, particularly those who manage key supplier relationships.
- By continuing to work proactively with our deal teams and portfolio companies, in human rights risk management, with a focus on those who are involved in the management of higher risk investments.

REPORTING

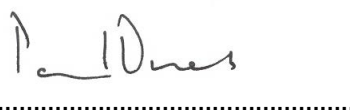
Actis maintains a dedicated speak-up/whistle-blower facility which may be used by anyone who has questions or concerns relating to the conduct of Actis, its people or its companies. This facility provides access to our Sustainability team and may be accessed via our website ([here](#)) or via e-mail to speakup@act.is - and this facility may be used by anyone who has concerns with respect to Actis' supply chain or its investments.

APPROVAL

This statement was approved on behalf of the members of Actis LLP and Actis GP LLP on 1 June 2023.



Torbjorn Knut Caesar
Senior Partner



Paul Owers
Designated Member