

Modern Slavery Policy

PURPOSE

ICG is committed to managing its investments in a socially responsible way, to ensure long-term success for its investments, clients and the communities it operates in. ICG understands that there is a risk that its operations have the potential to cause, contribute to, or be linked to modern slavery through its supply chains.

Respecting human rights is inherent in ICG's business operations and is embedded in our values, and reflects our organisational culture. This policy on modern slavery affirms ICG's commitment to contribute to ending all forms of modern slavery and outlines the approach to reducing the risk of modern slavery practices within its supply chains and operations. ICG is committed to actively engaging with its investee companies to ensure that steps are taken to mitigate modern slavery risks.

SCOPE OF POLICY

This policy applies to ICH and its subsidiaries, including:

- Infrastructure Capital Group Ltd A.C.N. 094 815 513 (ICG)
- Infrastructure Specialist Asset Management Ltd A.C.N. 098 827 671 (ISAM)
- Infrastructure Capital Services Pty Ltd A.C.N. 608 017 303 (ICS)

The principles apply to all staff of the ICH Group including, without limitation, directors, managers, associates, officers and employees.

CONTEXT

The term 'modern slavery' is used in the Modern Slavery Act 2018 (Cth) to describe situations where coercion, threats or deception are used to seriously exploit victims and undermine or deprive them of their freedom. The Modern Slavery Act defines modern slavery as including eight types of serious exploitation:

- Trafficking in persons;
- Slavery;
- Servitude;
- Forced marriage;

- Forced labour;
- Debt bondage;
- The worst forms of child labour; and
- Deceptive recruiting for labour or services.

ICG has also recognised UN Sustainable Development Goal (SDG) 8, “Decent Work and Economic Growth” as one of its SDGs in focus, based on the view that ICG can positively influence the attainment of this goal through its business operations.

Specific global targets underpinning SDG 8 include:

SDG 8.7: *“Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms”; and*

SDG 8.8: *“Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment”.*

ICG’s COMMITMENT

- ICG is committed to ensuring the risks of modern slavery practices in its investment operations and supply chains, including the supply chains of investee companies that it manages, is understood and addressed in accordance with internationally recognised principles and the Modern Slavery Act 2018.
- ICG will work with its suppliers to identify and manage modern slavery risks and where necessary will incorporate modern slavery into clauses of contracts.
- ICG will develop a plan to measure the effectiveness of the approach it has taken to address the risks associated with modern slavery in its business operations.
- ICG will ensure transparency with our employees, clients, suppliers and stakeholders regarding its commitment and the progress to date.
- ICG’s annual modern slavery statement describes key modern slavery risks and progress towards identifying and managing these risks.

GOVERNANCE & RISK MANAGEMENT

A key feature of our approach to managing modern slavery risks in our business is the governance structure of ICG’s investment operations. As Trustee, ISAM provides an independent governance overlay alongside ICG’s Investment Committee. The Trustee has established the Audit, Compliance & Risk Management Committee, which has responsibility for oversight of the risk management framework.



ICG has established a business wide Code of Conduct and set of ICG policies covering compliance with legal obligations, risk management, incident management and report. ICG's policies are reviewed annually by the ICG Board and include its ESG Policy, Climate Change Statement and Modern Slavery Policy.

ANNUAL STATEMENTS

ICG publishes an annual modern slavery statement in accordance with the Modern Slavery Act 2018 (Cth). The statements contain information about potential risks of modern slavery in the supply chain, due diligence, procedures we undertake to manage these risks, and the effectiveness of these measures. These can be made available upon request.