



AFRICAN INFRASTRUCTURE INVESTMENT MANAGERS



# Modern Slavery Policy

October 2020

## INTRODUCTION

African Infrastructure Investment Managers (AIIM) is one of the largest dedicated infrastructure managers in Africa. Central to AIIM's investment objectives and processes is our commitment to responsible investment and fulfilling our fiduciary duty as the custodian of client funds. We recognise that there are risks of linkage to modern slavery in our own operations and through our investments. There is particular risk where our investees operate in sectors and/or geographies where there is evidence of elevated modern slavery risks. We are committed to respecting human rights and tackling any risks of modern slavery in our business or investment portfolio's operations and supply chain. We support the International Labour Organisation standards, International Finance Corporation Performance Standards related to labour, support the United Nations Guiding Principles on Business and Human Rights and are adopters of the UN Global Compact.

## WHAT IS MODERN SLAVERY?

While there is no globally agreed definition of 'modern slavery', the term is used to cover a range of exploitative practices including human trafficking, slavery, forced labour, child labour, removal of organs and slavery-like practices. Modern slavery is the exploitation of other people for personal or commercial gain. Common forms of modern slavery to be aware of include<sup>1</sup>:

- **Human trafficking** – the use of violence, threats or coercion to transport, recruit or harbour people to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal.
- **Forced labour** – any work or services people are forced to do against their will under threat of punishment.
- **Debt bondage/bonded labour** – the world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.
- **Descent-based slavery** – most traditional form, where people are treated as property, and their 'slave' status was passed down the maternal line.
- **Slavery of children** – when a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery.
- **Forced and early marriage** – when someone is married against their will and cannot leave. Most child marriages can be considered slavery.

<sup>1</sup> <https://www.antislavery.org/slavery-today/modern-slavery/>

## PURPOSE

This Modern Slavery Policy outlines AIIM's commitments to the fight against slavery in its day to day business activities as an operating entity, as well as across the funds and investments under management.

## COMMITMENTS

As part of our commitment to not knowingly support and/or do business with any suppliers who are involved in slavery, AIIM endeavours to undertake the following:

- ensure that our and our investee supply chains are free of any forms of slavery;
- govern all current and future third party relationships with slavery issues in mind;
- undertake due diligence procedures to assess the potential risks of slavery in supply chains;
- communicate to supply chains that there is a zero-tolerance policy with regards to slavery;
- seek confirmation from supply chains that they are free of slavery risks and practices;
- communicate to suppliers that they are required to undertake continued self-monitoring and immediately report any violations of this Policy;
- include slavery issues in the supply chain monitoring and control procedures in company management systems;
- continue to raise awareness on the risks of modern slavery and provide guidance to investees and fund managers; and
- provide internal training to operations and investment teams on AIIM's approach to addressing the risk of modern slavery throughout the investment process.

## ROLES AND RESPONSIBILITIES

The implementation of this Policy is the responsibility of all members of the AIIM team, especially those employees who interact with third-party suppliers. Oversight and support for the implementation of this Policy is provided by the appointed Head of Sustainability.

Signed

Signed by:  
  
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**Olusola Lawson**  
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