



CORDIANT DIGITAL INFRASTRUCTURE LIMITED

Modern Slavery Policy

This statement is issued by Cordiant Digital Infrastructure Limited (“CDIL” or the “Company”), a Company operating under the laws of Guernsey, and externally managed by Cordiant Group (or “Cordiant”). The Cordiant Group refers to Cordiant Capital Inc. (registered as a Portfolio Manager and an Exempt Market Dealer with the Autorité des Marchés Financiers, the Ontario Securities Commission and other Canadian regulators as well as a Registered Investment Advisor with the U.S. S.E.C.); Cordiant Luxembourg Sàrl (regulated as an AIFM by the Commission de Surveillance du Secteur Financier of Luxembourg); Cordiant Digital Infrastructure Management LLP as well as related entities. The investment manager of CDIL is Cordiant Capital Inc. . This statement is in compliance with section 54 of the Modern Slavery Act 2015 (the “Act”). This statement constitutes a modern slavery and human trafficking transparency statement and sets out the Company’s approach to the prevention of slavery, servitude, forced or compulsory labour (together, “modern slavery”) within the Company.

Policy Statement

CDIL is committed to ensuring that its operations are free of any slavery and/or human trafficking and will not, under any circumstances, knowingly support or do business with any operation or supplier who is involved in such activities. CDIL expects that its Board, advisors, contractors, suppliers and consultants (including those employed by CDIL’s investment manager) to prevent acts of modern slavery and human trafficking from occurring within both their businesses and supply chains to the best of their ability. CDIL expects and encourages individuals involved in its operations to report any concerns of non-compliance with these standards to the relevant compliance and/or HR head. Any concerns raised in respect to Modern Slavery will be escalated to the Board for review and investigation. Investee companies of CDIL are expected to uphold the same standards as the Company in this respect.

Due Diligence

CDIL takes into account that the sector and locations in which it operates represent a relatively low risk of modern slavery and human trafficking. CDIL’s suppliers are also generally considered low risk in terms of sector and locations of operations, as many of CDILs suppliers are professional services firms. CDIL’s ‘Responsible Investment Policy’, which can be found on the CDIL website, outlines a policy framework that includes an ‘Exclusion List’, as well as a ‘Criteria Matrix’. Both the Company and its investment manager make clear, that without exception, no investments will be made in companies that violate anything outlined within the ‘Exclusion List’, which includes ‘forced labour or child labour’. The investment ‘Criteria Matrix’ asks investees to disclose their policies and procedures that ensure they safeguard against human rights; support the elimination of all forms of forced and compulsory labour; and support the effective abolition of harmful child labour. If an investee, due to its size, age or other material factor, has yet to produce any policy or procedure that outlines their commitment to the abolition of Modern Slavery, CDIL will help an investee implement a policy that adheres to CDILs own standards. This is precedent on the investee displaying no material risks concerning Modern Slavery, and that their reasoning for not having such a policy is acceptable to CDIL and its standards.

Employee Training

As an externally managed Company, CDIL has no employees. CDIL Board is made aware of the risks regarding modern slavery and human trafficking and the steps that can be taken to reduce those risks.

This statement applies for the financial year ending 31 March 2024

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Incorporated in Guernsey under The Companies (Guernsey) Law, 2008 with registered number 68630
Registered with the Guernsey Financial Services Commission as a closed-ended collective investment scheme