



JLEN Environmental Assets Group Limited

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Statement on Modern Slavery for the financial year ended 31 March 2024

The Company

JLEN Environmental Assets Group Limited (the “Company”) is a closed-ended investment company incorporated in Guernsey which invests in a diversified portfolio of environmental infrastructure that supports more environmentally friendly approaches to economic activity whilst generating a sustainable financial return.

The Company does not provide goods or services in the normal course of business and has no customers, employees or turnover. Accordingly, the Company does not fall within the scope of the UK Modern Slavery Act 2015 (the “**Modern Slavery Act**”) and is not obliged to make a slavery and human trafficking statement pursuant to Section 54 of the Modern Slavery Act. However, the board of directors of the Company (the “**Board**”), comprising six independent non-executive directors (the “**Directors**”), has chosen to publish this voluntary statement for the financial year ended 31 March 2024 as part of the Company’s ongoing commitment to high standards of business conduct and in recognition of the importance of the issues which the Modern Slavery Act seeks to address.

Business and risk profile

As an investment company which does not provide goods or services in the normal course of business, and does not have direct employees or customers, the Company does not have typical supply chains. The Company conducts its core activities through third-party service providers, of which the most significant is Foresight Group LLP (the “**Investment Manager**”) in its role as the Company’s external alternative investment fund manager (“AIFM”) with discretionary investment management authority for the Company. The Board conducts an annual review of the performance of the Company’s Investment Manager, as well as other service providers and professional advisers.

The Company’s supplier base is made up of providers of commercial, financial, management, operational and maintenance services and the Directors expect the Company’s service providers to adopt the same standards and will not deal with any organisation that they believe may be connected with slavery in any way. Each service provider has an established track record and through regulatory oversight is required to have in place suitable policies and procedures to ensure they maintain high standards of business conduct and employ corporate governance best practice.

Policies

The Board is responsible for matters of social and environmental importance, including combatting modern slavery and human trafficking which form part of its broader social and environmental responsibility. Overseen by a dedicated ESG (“Environmental, Social and Governance”) committee, the Board regularly reviews the Company’s policies and practices in this regard and seeks to address any issues which arise.

The Board takes the risk of modern slavery in its value chains seriously and implements necessary policies to identify the areas of potential concern. Decisions about new acquisitions and entering into new contracts are informed by the Company’s understanding of modern slavery risks and ESG objectives as set out in the Company’s ESG Report which is released annually and available at <https://www.jlen.com/>.

Whilst the Directors recognise the critical importance of preventing modern slavery, they acknowledge that, as non-executive Directors of an externally managed investment company, their influence is necessarily limited and will be significantly informed by the approach and policies of the Investment Manager. In this context, the Board specifically notes the Investment Manager’s Modern Slavery Act statement which sets out the Investment Manager’s approach to matters such as services and supply chain due diligence and training of employees, recruitment and welfare. As part of Foresight Group, the Company’s policy and

practices in relation to modern slavery and human trafficking are included in the Investment Manager's Modern Slavery Act statement which is available at <https://www.foresightgroup.eu/modern-slavery-statement>.

Due diligence process and steps taken to assess and manage slavery and human trafficking risk

In order to fulfil its investment objectives, the Company targets investments into infrastructure assets and asset-backed businesses such as wind farms, solar parks, green gas producers, waste management, food production and others.

In general, the Company considers its exposure to human trafficking to be relatively limited but is aware that the renewable energy value chain carries the risk of significant impacts on human rights and has taken steps to ensure that such practices do not take place in its business nor the business of any third-party service provider.

All of the Company's service providers are reputable firms and the Company carries out risk-based due diligence on its service providers to ensure slavery and human trafficking does not take place in its organisation or supply chains. As part of its due diligence into new service providers (and its oversight of existing service providers, including the Investment Manager), the Board reviews and assesses direct suppliers and contractors against ESG criteria.

The Company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery and does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

In line with the OECD Guidance for Institutional Investors, as a parent company, the Company can use its shareholding rights to encourage investee companies to comply with its ESG policies and relevant laws, including, where applicable, the Modern Slavery Act, and implement appropriate measures against potential human rights abuse.

The Company is committed to working with its third-party service providers to foster best practice on these issues and works closely with them to outline its expectations and requirements.

Training

Training is a mandated requirement for the Investment Manager; all employees must complete modern slavery and human trafficking training on an annual basis to ensure they can effectively identify and manage such risks. The Directors are made aware of relevant modern slavery risks and the related UK legal framework.

Ongoing commitment and progress

The Board will continue to monitor potential risk areas identified in its supply chains.

The Board will continue to monitor its business and the policies of its service providers in order to identify any areas of increased risk. Directors are encouraged to report any concerns they may have.

Governance and approval

This statement was approved by the Board on 20 June 2024 and will be updated annually.



Ed Warner
Chair
JLEN Environmental Assets Group Limited

20 June 2024