



Sequoia Economic Infrastructure Income Fund Limited **(“SEQI” or the “Company”)**

Modern Slavery Act Transparency Statement

Sequoia Economic Infrastructure Income Fund Limited (“SEQI” or “the Company”) seeks to provide investors with regular, sustained, long-term distributions and capital appreciation from a diversified portfolio of senior and subordinated economic infrastructure debt investments. The Company has adopted a series of relevant sustainability-related disclosures and an ESG policy which describes the criteria applied to both new investments and to the management of the existing portfolio. Further details can be found on its website: <https://www.seqi.fund/>

Policy

Sequoia Investment Management Company Limited (“SIMC”) is the Company’s appointed Investment Adviser and is a signatory to the Principles for Responsible Investment (“PRI”), a leading framework based on international conventions and targeted at corporate investors as a means of incorporating ESG issues into investment practice.

The six high-level principles of the PRI which SIMC has fully incorporated into its investment processes and decisions can be summarised:

- incorporate ESG issues into investment analysis and decision-making processes.;
- be active owners and incorporate ESG issues into our ownership policies and practices;
- seek appropriate disclosures on ESG issues by the entities in which we invest;
- promote acceptance and implementation of the Principles within the investment industry;
- work together to enhance our effectiveness in implementing the PRI; and
- report on our activities and progress towards implementing the Principles.

SEQI’s ESG policy includes a focus on social indicators, including health and safety policies and procedures, compliance with employment laws and human rights related issues. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. SEQI has a zero-tolerance approach to modern slavery and it is committed to acting ethically and with integrity in all its business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or its supply chain.

Structure and supply chain

SEQI’s portfolio comprises investments in economic infrastructure private loans and bonds across a range of industries in stable, low-risk jurisdictions that promotes essential economic activity. Typical jurisdictions will include mature, investment grade jurisdictions such as the UK, Western Europe, North America, Australia and New Zealand. The Company principally invests in operational projects with a proven track record and stable cash flows, spread across 8 sectors and 25 sub-sectors, reducing exposure to any one sector or business cycle.

Full details of SEQI’s investment portfolio can be found on the Company’s website: <https://www.seqi.fund/portfolio/>.

The Company is structured as an investment fund and does not have any direct employees and therefore the application of the Slavery Act is of greater relevance to the companies in SEQI's supply chain and to SIMC. SIMC operates its business and its investment activities in accordance with the UN Global Compact which includes supporting and respecting the protection of internationally proclaimed human rights and making sure they are not complicit in human rights abuses, the elimination of all forms of forced and compulsory labour, the effective abolition of child labour, and the elimination of employment discrimination. The Board and SIMC recognise the Company's responsibilities to society in relation to SEQI's supply chain (both to SEQI and to the companies in which it invests), and SIMC works collaboratively with the management teams of the portfolio companies and with sponsors and seeks to ensure that suppliers share the Company's values and comply with relevant legislation.

Due diligence processes and risk assessment

SIMC's loan origination process includes an ESG scoring framework which helps to determine how capital will be allocated and to measure its progress over time in a quantitative manner.

In relation to SEQI's portfolio of economic infrastructure projects, SIMC actively implements good sustainability and risk management principles by actively monitoring credits in the portfolio. SIMC maintains its own sustainability and risk management policies and procedures, and conducts staff training as required.

Measuring effectiveness

SEQI's Annual Report contains further detail on the implementation of the Company's ESG Policy, including details on how the ongoing monitoring processes employed by SIMC enable the Board to actively monitor developments within the investment portfolio. Through applying the Company's ESG scoring framework against the capital development pipeline the Board seeks to further enhance the sustainability credentials of the portfolio over the longer term, whilst also preserving credit quality.

SIMC analyses the findings from the ESG information obtained during the new transaction analysis process which takes into account issues such as modern slavery and other human rights issues. SIMC has in place a whistleblowing policy under which individuals working at SIMC can disclose on an anonymous or confidential basis any malpractices associated with SEQI and its portfolio or any attempt to deliberately conceal wrongdoing associated with SEQI and its portfolio. Reports can be made directly to relevant members of the SEQI Board. SEQI's other key service providers each have a whistleblowing policy in place.

Approval

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes SEQI's current modern slavery and human trafficking statement. This statement was approved by the Board of Directors on 8 March 2023. It will be reviewed again in 2024.

Signed for and on behalf of the Board by:

James Stewart

James Stewart

Director

Date signed: 8 March 2023