



Victory Hill Capital Advisors LLP

MODERN SLAVERY STATEMENT

Energy Transition • Infrastructure • Sustainability

March 2022



Definition

The Modern Slavery Act (“MSA”) was enacted by the UK Government in 2015 in an effort to confront all forms of human trafficking and slavery, including forced, compulsory or coerced labour, deprivation of personal freedom and the exploitative movement of people.

About Victory Hill Capital Advisors LLP

Victory Hill Capital Advisors LLP (“Victory Hill”) is a specialist investment firm targeting direct investments in global energy infrastructure that support the Sustainable Development Goals, with the aim of facilitating an orderly energy transition to a Net Zero Carbon future.

Victory Hill are advisor to VH Global Sustainable Energy Opportunities plc (“GSEO” or “The Company”), a UK Closed Ended Investment Company listed on the premium segment of the London Stock Exchange. The Company seeks income yield and NAV growth by investing in a mix of stable yielding sustainable energy infrastructure investments that are in operation, in construction or ‘ready-to-build’ but will not invest in projects that are under development or are in pre-consent stages.

The Company targets a diversified portfolio of global sustainable energy infrastructure assets, predominantly in countries that are members of the EU, OECD, OECD Key Partner Countries or OECD Accession Countries.

Employment Practises

At the core of Victory Hill are the people, who make it all possible.

We endeavour to be a best-in-class employer, providing our staff with the opportunity to excel within a supportive environment. We have high recruitment standards for all roles within Victory Hill and all of our staff hold professional qualifications and many are subject to independent professional regulation and oversight.

We believe our Code of Ethics, Diversity & Inclusion and employment policies are fair, transparent and implement positive working practices for all of our employees.

We commit to keeping all policies under review and making enhancements where appropriate.

Supply Chain Review

Victory Hill conducts due diligence of relevant third parties with whom we do business with to ascertain where there might be a higher risk of slavery or human trafficking in its supply chain and the business integrity of the third party. This assessment is done by an independent third-party in accordance with our Sustainability Policy (available upon request) and alignment with the UN's Sustainable Development Goals.

We will also conduct regular reviews of material service providers to our sites around the world and aim to ensure that the contracts reflect our stance in relation to our Sustainability Policy.

Most of our suppliers are professional and business services firms who provide transaction advisory and due diligence services, with their own short, low-risk supply chains relating to these services. As such, we consider the risk of modern slavery and trafficking within our supply chain to be low.

A supplier's violation of the Anti-Slavery and Human Trafficking Policy may result in termination of our relationship with the supplier.

Our Slavery and Human Trafficking Risks

In our regulated asset management business, the risk of slavery and human trafficking is, by definition, extremely low. Victory Hill can only hire personnel with appropriate training, experience, and without a criminal record. As such, we endeavour to attract the best talent and provide them with a demanding and rewarding working environment.

In our supply chain, the risk of slavery and human trafficking is also very limited because our service providers are known, reputable, professional and/or regulated service providers. Furthermore, we conduct independent audits of our business partners around the world on an ongoing basis and mitigate these risks by aligning ourselves with the UN's Sustainable Development Goals.

Our Slavery and Human Trafficking Prevention Endeavours

We endeavour to prevent slavery and human trafficking in our business and supply chains by:

- Periodically reviewing and adapting our company policies to raise awareness for and reflect our endeavours in the prevention of slavery and human trafficking;
 - Subjecting new prospective employees to strict checks on their identity, references, qualifications and criminal records without exception;
 - Including appropriate contractual language in our service and supplier contracts;
 - Periodically subjecting our supplier and service procurement processes to internal audit spot checks.
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Adherence to our expectations by suppliers going forward

Victory Hill has developed a Modern Slavery risk assessment framework for new vendors and an internal escalation procedure for concerns relating to slavery, human trafficking, and other poor working practices within our supply chain. Depending on the risk factors presented by a supplier, additional due diligence may be undertaken, including screening of vendors against international sanctions or watch lists, litigation, or negative press. Where we believe there may be a higher risk of harmful practices within a sector a supplier operates in, we may also seek contractual representations from our suppliers regarding their own compliance with the MSA.

Training

Our employees are provided with sufficient knowledge, training and tools to ensure they can effectively identify and manage ESG-related risks and opportunities within their roles and responsibilities.

Further Steps

We continue to keep our relevant policies and their implementation under active review, to be alert to the risks of slavery and human trafficking in our own business or in our supply chains and to be ready to take appropriate action promptly to address any concerns that may arise.

This Statement

The Partners of Victory Hill Capital Advisors LLP are committed to implementing and enforcing systems and controls to safeguard against modern slavery, human trafficking and harmful working practises.

This statement was approved by the Managing Partners of Victory Hill Capital Advisors LLP.

Anthony Catachanas
CEO, Victory Hill Capital Advisors
March 2022