



Supplier Code of Conduct

October 2020



CONFIDENTIAL

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1. Purpose

- 1.1. The purpose of this Supplier Code of Conduct (Code) is to articulate our expectations and requirements for all suppliers providing contracted goods and/or services to Quinbrook Infrastructure Partners Group (Quinbrook, we, us, our) and to assets and companies (Operating Companies) managed by any Quinbrook portfolio companies.

2. Our Code

- 2.1. All of our suppliers have a responsibility to monitor compliance with this Code and to notify us of any breaches and take reasonable steps to address, remedy and prevent repetition of any breach of this Code or possible breaches of this Code.
- 2.2. We reserve the right to undertake due diligence and risk assessments to verify compliance with our Code and expect our suppliers to cooperate and provide supporting evidence as we may reasonably require to monitor and review their compliance.

3. Your conduct

- 3.1. We seek to work with businesses whose values match our own. We require our suppliers to comply with all applicable laws and, in all cases, to meet the standards and principles set out in this Code across all areas of their business. Compliance with such laws, standards and principles is a material consideration for us in assessing every aspect of our supplier relationships.

3.2. Ethics, anti-bribery and corruption, and sanctions

Our suppliers must:

- (1) comply with all applicable laws relating to the prevention of bribery, corruption, fraud, tax evasion or similar or related activities.
- (2) seek to identify and report any conflicts of interest, be it competing personal or professional interests. Our suppliers will avoid even the appearance of conflicts of interest in their work with us.
- (3) respect intellectual property rights and act in a manner protecting intellectual property rights.
- (4) in all dealings with us, not engage directly or indirectly in trade activities or include in the supply chain any goods or services sourced from sanctioned persons,

countries or organisations; in accordance with all sanctions laws with which we must comply, including local or regional sanctions as mandated by the Government for the relevant jurisdiction applicable to us.

- (5) maintain a policy reasonably assuring that any cobalt, tantalum, tin, tungsten and gold in products that they manufacture does not benefit armed groups that commit human rights abuses in or near the Democratic Republic of the Congo, and must provide due diligence materials to us upon request.
- (6) protect the privacy of personal information of everyone with whom they do business.

3.3. Cybersecurity, Data Protection and Confidentiality

Our suppliers are expected to:

- (1) Ensure appropriate cybersecurity measures to manage the risk of cyber threats.
- (2) Use reasonable efforts to protect sensitive information against loss, theft, unauthorised access, alteration or disclosure.
- (3) Inform the Customer of, and cooperate with the Customer, in relation to any data breach or incident that could impact the Customer.

3.4. Community

Our suppliers must:

- (1) seek out opportunities to support local industry development wherever possible via local sourcing of workers and job creation.
- (2) create an equal opportunity and inclusive workplace and seek to engage a workforce that reflects the local population diversity and supplier base including Indigenous owned businesses, disability and social enterprises.
- (3) commit to the protection of Indigenous cultural and heritage sites in the places in which they operate.
- (4) monitor the impact of technology on job obsolescence risk and have in place processes for training and continuing education to mitigate those risks.

3.5. Diversity and inclusion

- (1) Our suppliers must comply with all applicable discrimination laws and promote diversity and inclusion within their own workplace, including in recruitment, retention and promotion practices.

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- (2) Without limiting the above, our suppliers will not discriminate based on race, colour, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, ethnicity, national origin, caste, disability, genetic information, medical condition, pregnancy, religion, political affiliation, union membership, covered veteran status or body art.

3.6. Health and safety

- (1) Our suppliers must comply with all applicable health and safety laws and aim to create a safe working environment for its employees and anyone else affected by their businesses.
- (2) Our suppliers will provide workers with ready access to clean toilet facilities, potable water, and, to the extent relevant, sanitary food preparation, storage and eating facilities. If our suppliers provide workers with residential facilities, those facilities will be clean and safe, with adequate personal space, entry and exit privileges, emergency egresses, heating and ventilation, and hot water for showering.

3.7. Labour

- (1) Our suppliers must not use or permit any form of forced, bonded or indentured labour. Suppliers must not unreasonably restrict workers' freedom to move into, out of or at working facilities.
- (2) Our suppliers must never use child labour and shall only use workers who are 15 or older, have achieved the age of compulsory education, and meet the minimum legal age for employment. Our suppliers must ensure that workers under the age of 18 do not perform work that is likely to jeopardise their health or safety, other than as allowable under local laws with required training and safety (such as trained apprenticeships or trade employment).
- (3) Our suppliers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed or perform work.
- (4) Our suppliers must not permit harassment, abuse, corporal punishment or inhumane treatment.
- (5) Our supplier's workers must be permitted to associate freely, bargain collectively and seek representation in accordance with local laws.

3.8. Human rights

- (1) Our suppliers, whether directly or through their supply chain, must comply with all applicable human rights related laws in respect of their employees.

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- (2) They must conduct their business activities in a manner which respects human rights and must not hold another person in slavery or servitude, employ, engage or otherwise use forced or compulsory labour, trafficked labour or child labour.
 - (3) They must ensure that any goods manufactured or produced are not manufactured by forced or indentured labour, including by Uyghurs, Kazakhs, Kyrgyz, and members of other Muslim minority groups from Xinjiang.
 - (4) They must have in place adequate procedures to identify, prevent, mitigate and account for modern slavery and other human rights impacts in their operations and supply chains.

3.9. Environmental and Sustainability

Our suppliers must:

- (1) comply with all applicable environmental laws and continually strive to improve their sustainability performance, focusing on reduction (as appropriate) of waste, carbon emissions, water and natural resources consumption.
- (2) work to reduce consumption of resources, track and seek to improve energy efficiency, energy consumption and reduction of greenhouse gas emissions.
- (3) seek to, where feasible or required by local law or regulation, monitor, treat and reduce hazardous air emissions, wastewater and waste generated from its operations.
- (4) adhere to our specific requirements restricting use of specific substances notified from time to time.

4. Use of this Code

- (1) All new and existing contracted suppliers are required to comply with our Code and demonstrate their commitment to doing so.
- (2) Suppliers who engage sub-contractors when providing goods or services to us must make them aware of our Code.
- (3) Compliance with our Code will be used as part of our supplier evaluation, selection and contract management process.
- (4) When a supplier does not meet our requirements, corrective action plans will be established and monitored for progress. We will terminate the relationship with suppliers that repeatedly and knowingly violate our Code.

5. Raising Questions & Concerns

We encourage all suppliers who have questions in relation to proper conduct or the contents of this Code to raise them with them with us.

If a Supplier becomes aware of a circumstance or action that contravenes, or is suspected to contravene or appears to contravene their Supplier Code of Conduct, they should raise this with us.

6. Declaration of the Supplier

We hereby acknowledge that we have received a copy of the Quinbrook Supplier Code of Conduct and commit to comply with its principles and requirements.

Signature

Date

Name Printed