



---

# Human Rights Policy

February 2023



CONFIDENTIAL

---

## Contents

|   |   |
|---|---|
| 1. Purpose .....  | 3 |
| 2. Definitions .....  | 3 |
| 3. Scope .....  | 3 |
| 4. Policy Responsibility .....  | 3 |
| 5. Our Commitment to Respect Human Rights .....                           | 4 |
| 6. Commitment to Diversity, Equity and Inclusion and Fair, Safe Work..... | 5 |
| 7. Our Expectations.....  | 5 |
| 8. Reporting concerns .....   | 5 |
| 9. Remedies.....  | 6 |
| 10. Policy Updates.....   | 6 |

---

## 1. Purpose

---

The purpose of this Human Rights Policy (the “Policy”) is to provide guidance as to the commitment of Quinbrook Infrastructure Partners to respecting human rights across its domestic and global operations. Quinbrook has an important role to play in investing in and fostering ethical business practices that help to eradicate modern slavery and protect human rights.

This Human Rights Policy formalises Quinbrook’s commitment to respect human rights.

## 2. Definitions

---

|             |   |
|-------------|---|
| Board       | means the Board of Directors of Quinbrook Infrastructure Partners (Jersey) Limited (“Manager”). |
| Investments | refer to assets managed by the Manager and any of its related entities and affiliates.          |

---

## 3. Scope

---

This Policy is applicable to Quinbrook Infrastructure Partners (Jersey) Limited and any body corporate or related entity (“we”, “us” or “Quinbrook”). It sets out Quinbrook’s expectations of all individuals working for Quinbrook, including directors, officers, employees (whether full time, part time, casual, temporary, including interns and seconded employees) and, where applicable and based on the relevant contractual terms, independent contractors, (“Quinbrook Personnel”).

This Policy will be interpreted subject to local laws and regulations in each jurisdiction. Where local law differs from the international standards referenced in this Policy, we will seek to follow the higher standard; where local law and international standards conflict, we will adhere to local law, while seeking ways to honour the principles of internationally recognized human rights. The specific approach to implementation of the Policy across various Investments and as between portfolio companies, is considered on a case by case basis to comply with relevant local requirements.

## 4. Policy Responsibility

---

---

The Board has delegated responsibility to Quinbrook’s Audit, Risk and Compliance Committee (“ARC Committee”) for setting and reviewing this Policy and reporting to the Board on a regular basis.

Oversight and accountability for compliance with this Policy and its revision from time to time is the responsibility of the ARC Committee. The ARC Committee is responsible for adherence to and regularly supporting the review of this Policy and overseeing the implementation of this Policy. The Policy is required to be read and understood by all Quinbrook team members and its implementation will be supported by senior management primarily responsible for each of Quinbrook’s key operating locations: the United States, Australia and the United Kingdom. These correspond with Quinbrook’s key investment regions as at the current date.

## 5. Our Commitment to Respect Human Rights

---

This Policy outlines Quinbrook’s commitment to respect human rights in line with the United Nations Guiding Principles on Business and Human Rights. This refers, at a minimum, to internationally recognised human rights, as set out in the International Bill of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

Quinbrook is committed to the ten principles of the United Nations Global Compact which relate to human rights, labour, environment and anti-corruption, and supports the international agenda to abolish human trafficking, slavery, forced and child labour.

Quinbrook supports equal opportunity and treatment for all to ensure the elimination of discrimination throughout its activities and to create a fair and inclusive workplace, engaging a workforce that reflects the local population diversity.

*As an investor, Quinbrook:*

- is committed to the highest ethical standards and behaviour;
- seeks to identify and understand its connection to human rights risks;
- seeks to adopt strategies and processes to identify, mitigate and address human rights risks in its investment portfolios and take the risk of human rights impacts into account when making investment decisions;
- proactively engages with its portfolio companies on issues related to human rights;
- communicate how we address human rights risks internally and externally.

*As a purchaser of goods and services, Quinbrook:*

- seeks to enter contractual arrangements with suppliers that can comply with and promote the principles contained in this Policy and Quinbrook’s Supplier Code of Conduct or have in place equivalent policy commitments and management systems;

- 
- endeavours to undertake due diligence within its operations and supply chains, to identify and remediate actual or potential adverse human rights impacts which Quinbrook is directly linked to;
  - will communicate to potential key suppliers that it has a zero tolerance policy with regards to slavery; and
  - will work with suppliers to assist them in their understanding of human rights and adoption of best practices to ensure respect for human rights.

## 6. Commitment to Diversity, Equity and Inclusion and Fair, Safe Work

*As an employer, Quinbrook:*

- is committed to providing a workplace where all staff are treated without discrimination or harassment;
- strives to provide working conditions that are safe, healthy and respectful of human rights; and
- is opposed to and will oppose all forms of slavery, forced or compulsory labour and child labour, both within its organisation and within its supply chain.

## 7. Our Expectations

---

To give effect to this Policy, Quinbrook Personnel are expected to:

- comply with all applicable local laws and regulations wherever we operate. Where local laws and international standards differ, you should aim to follow the higher standard; where they are in conflict, you should adhere to local law, while seeking ways to honour the principles of internationally recognized human rights;
- read, understand and comply with this Policy and any relevant Quinbrook policies, including Supplier Code of Conduct, Compliance, Processes and Procedures, Equal Employment Opportunity Policy;
- comply with the expectations set out in the policy when purchasing goods and services on behalf of Quinbrook;
- never knowingly engage in any activity that may lead to non-compliance with this or any other Quinbrook Policy; and
- report concerns, known or suspected violations of this Policy as set out below.

## 8. Reporting concerns

---

---

Any concerns related to human rights impacts in Quinbrook’s operations or in its supply chain or any other concerns or known or suspected violations of this Policy should be reported in accordance with Quinbrook’s whistleblowing framework. All Quinbrook Personnel are expected to report known or suspected violations of applicable laws, regulations, policies and Quinbrook’s broader ethical standards.

## 9. Remedies

---

Quinbrook is committed to providing effective remedies where its operations cause or contribute to adverse human rights impacts. Quinbrook will engage directly with affected persons, and work with its business partners and other stakeholders to remediate such impacts and consider how its internal processes can be improved to prevent similar impacts in the future.

## 10. Policy Updates

---

This Policy is the primary responsibility of the ARC Committee. It will be reviewed regularly and updated as deemed necessary by the ARC Committee.

**Quinbrook Infrastructure Partners**  
**February 2023**