

Flexitricity

Human Rights Policy

October 2020



Flexitricity is a portfolio company of Quinbrook Infrastructure Partners



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1. Purpose

The purpose of this Human Rights Policy (the “Policy”) is to provide guidance as to the commitment of the Quinbrook Group including its related entities (“Quinbrook” or “We”) to respecting human rights across our domestic and global operations and our supply chain. We have a unique 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 our 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 corporation and affiliates.
Quinbrook or Manager	refers to Quinbrook Group and its related corporations and affiliates in any capacity as responsible entity, manager or advisor for Investments.

3. Scope

This Policy is applicable to:

- Quinbrook Group, the Manager and each of its related corporations and affiliates;
- managed funds or other investment vehicles managed or advised by Quinbrook; and
- all Quinbrook management and investment teams, including those located in its international offices.

This Policy will be interpreted subject to local laws and regulations in each jurisdiction. The specific approach to implementation of the Policy across various Investments and as between portfolio companies, may also need to be considered on a case by case basis to comply with relevant local requirements.

4. Policy Responsibility

The Board has delegated responsibility to the [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 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 Investment 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. Commitment to Human Rights

Quinbrook:

- recognises our responsibility, under the UN Guiding Principles on Business and Human Rights, to respect human rights in all areas of our operations;
- respects, at a minimum, 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;
- is committed to the ten principles of the United Nations Global Compact which relate to human rights, labour, environment and anti-corruption and we support the international agenda to abolish human trafficking, slavery, forced and child labour; and
- supports equal opportunity and treatment for all to ensure the elimination of discrimination throughout our activities and to create a fair and inclusive workplace, engaging a workforce that reflects the local population diversity.

As an investor, we:

- are committed to the highest ethical standards and behaviour;
- seek to identify and understand our connection to human rights risk;
- seek to adopt strategies and processes to identify, mitigate and address human rights risks in our investment portfolios;
- proactively engage with our portfolio companies on issues related to human rights;
- take the risk of human rights impacts into account when making investment decisions, including divestment; and
- seek to use our leverage to influence decision-making in our investments to take into account human rights considerations.

As a purchaser of goods and services, we:

- seek to enter contractual arrangements with suppliers that can comply with and promote the principles contained in this Policy and our Supplier Code of Conduct;
- endeavour to undertake due diligence within our operations and supply chains, to identify and remediate actual or potential adverse human rights impacts, which we may cause, contribute or be directly linked to;
- will communicate to potential key suppliers that we have 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.

As an employer, we:

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

6. Reporting concerns

Any concerns related to human rights impacts in our operations or in our supply chain should be reported in accordance with our whistleblowing framework. Everyone is expected to report known or suspected violations of applicable laws, regulations, policies and our ethical standards.

7. Remedies

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

8. 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
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