



quinbrook
infrastructure
PARTNERS

ESG Policy

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1. Context and Purpose

Quinbrook Infrastructure Partners Group ('Quinbrook') aims to protect and enhance the value of investments over the long-term for the benefit of our investor clients. This includes taking measures to better assure the delivery of positive financial returns to investors through mitigation of risk and the addition of non-financial value that benefits communities and individuals involved.

We believe that the integration of environmental, social and corporate governance ('ESG') considerations into investment management processes and ownership practices can have a direct and positive impact on financial performance and risk reduction.

As such, we expect to achieve our aims by being an active and responsible manager of the assets in which we invest, and by fostering a culture of ethical behaviour and integrity within our organisation and the wider network of people and organisations we interact with.

The purpose of this Policy is to outline Quinbrook's approach to integrating the consideration of ESG factors into investment analysis and decision making, stakeholder engagement and our contribution to the wider infrastructure investment community.

2. Scope

This Policy covers the core operations of Quinbrook, including all infrastructure investment opportunities considered by the Investment Committee and made on behalf of all investors whose funds are managed by Quinbrook.

Our ESG Policy will be interpreted in accordance with local laws and regulations in each market in which we operate, and our contractual requirements as a minimum. However, Quinbrook may set its own higher standards in many instances. In such cases, these will be applied in priority.

The implementation of this Policy by Quinbrook subsidiary businesses and our portfolio companies may need to be considered on a case by case basis to comply with relevant local requirements and existing practices.

3. Quinbrook's Approach to Responsible Investing

Quinbrook will seek to integrate the thoughtful consideration and management of ESG issues throughout the investment cycle, in its internal operations, ongoing ownership of assets and businesses, and in its engagement with the wider investment community.

Quinbrook believes that assessing and monitoring ESG criteria is a key element of risk analysis and should serve to improve our investors' of the invested assets, their resilience to key project risks, and their long-term value.

Our investment strategy encompasses our approach, to the mitigation of the impacts of climate change through the construction and operational improvements of lower carbon and renewable energy. The Funds managed by Quinbrook focus on lower carbon and renewable power infrastructure assets where our team has experience and can exercise their individual and collective talents to add value both for our investors and the community at large.

Quinbrook will continually assess the markets in which we operate, progress of investments under our evaluation, and the ongoing operations of completed investments to assess if circumstances change or information becomes available suggesting that an investment may be or becomes inconsistent with this Policy. If such a case arises, Quinbrook is committed to taking positive action to remedy that circumstance and restore consistency with this Policy. Should a decision be taken by Quinbrook that



an investment cannot be remediated and its departure from this Policy is material and adverse to the interests of our investors and to the Principles of Responsible Investing more generally, a potential divestment of that asset will be proactively considered by Quinbrook.

Quinbrook also aims to be transparent in our approach to incorporating ESG issues into our investment process and we commit to include a report on our progress and outcomes in our Annual Report to investors.

4. Roles and Responsibilities

- 4.1. Oversight of and accountability for Responsible Investment is the responsibility of each director of the board of the Manager and of each member of the Investment Committee.
- 4.2. This Policy is reviewed annually by the board of directors of the Manager and the Investment Committee.
- 4.3. Implementation of specific ESG initiatives, monitoring of compliance, and reporting to stakeholders is led by an integrated ESG team which includes representatives of both the investment and operations functions outside of those who sit on the board of the Manager and the Investment Committee. Within this team, Quinbrook has appointed an individual to be primarily responsible for implementation in each of the Target Regions: USA, Australia, and the UK.
- 4.4. Adherence to the Policy is the responsibility of every regional investment team and every individual within the Quinbrook Group.

5. Integration of ESG into Investment Management

Quinbrook uses its ESG values to inform, shape, and help make key decisions at all stages of the investment process. Quinbrook recognises that for these policies to be properly integrated, effective governance structures must be implemented at the deal structuring stage to ensure accountability, appropriate controls and transparency. Relevant factors to be considered include:

- 5.1. Consideration of fit of ESG values with the broader Investment Strategy
- 5.2. Assessment of political and reputational risk at the origination stage
- 5.3. Preliminary screening of investments/due diligence with respect to issues including:
 - 5.3.1. Safety record of key participants/stakeholders
 - 5.3.2. Compliance with local laws and regulations
 - 5.3.3. Environmental impact and benefits of operations/proposed operations
 - 5.3.4. Governance transparency, such as probity and related party dealings
 - 5.3.5. Social benefits of the investment, highlighting job creation and tangible community benefits
 - 5.3.6. Risks and risk mitigation with specific reference to environment, social and governance issues and impacts
 - 5.3.7. Need to involve external subject matter experts where required
 - 5.3.8. Document all ESG findings and risks
- 5.4. Recommendation to Investment Committee

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- 5.4.1. Assessment of areas for value creation by the Quinbrook team
 - 5.4.2. Recruitment/installation of asset management with ESG mindset
 - 5.4.3. 100-day plan post-investment contains specific ESG activities
 - 5.5. Asset Management
 - 5.5.1. Responsible Procurement Policy which ensures ESG issues related to the purchase of major equipment and services are investigated
 - 5.5.2. Impose 'best practice' policies on contractors in regards to health and work safety practices both in evaluation for selection and enforcing during engagement
 - 5.6. Monitoring
 - 5.6.1. Continuous reporting obligations, updated at least annually, to enable progress and developments on ESG issues to be monitored and risk factors identified
 - 5.6.2. Track changes in law, policy and regulation that may be relevant to the value and risk of underlying portfolio assets
 - 5.6.3. Integrate findings of this ongoing monitoring into the overall asset management process to enable Quinbrook to balance financial, social and environmental growth factors throughout the life of investments.

6. Environmental Considerations

Quinbrook is committed to reducing direct and indirect environmental impacts through the implementation of the following practices where practicable in underlying portfolio companies and project investments:

- 6.1. Monitoring and reduction of energy use and greenhouse gas emissions
- 6.2. Investing in energy efficient technologies, where cost effective
- 6.3. Monitoring and reduction of water usage, where possible
- 6.4. Minimising waste through recycling and efficient use of resources
- 6.5. Developing processes for assessing environmental impacts in the supply chain
- 6.6. Ensuring the space occupied by investee entities are designed, occupied and operated with the objective of best practice environmental performance, including efficient use of energy (i.e. lighting), minimising waste (i.e. paper) and recycling where possible

7. Social Considerations

Quinbrook aims to foster a culture of respect, personal responsibility, diversity and ethical behaviour incorporating an awareness and vigilance in relation to the following key issues:

- 7.1. Inclusive workplace behaviour
 - 7.2. Brand loyalty
 - 7.3. Community impact awareness and proactive participation
 - 7.4. Energy security
 - 7.5. Job creation
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8. Corporate Governance Considerations

Quinbrook believes that high standards of corporate responsibility make good business sense, having the potential to protect and enhance investment returns for our clients. In particular, we will comply with standards for:

- 8.1. Compliance with regulatory and legal requirements – see Compliance Manual
- 8.2. Corruption and bribery – gifts and entertainment section of Compliance Manual
- 8.3. Health and safety within our workplace environments
- 8.4. Conflicts of Interest
- 8.5. Safeguarding of personal information

9. Stakeholder Engagement and Reporting

Quinbrook will engage with our interested clients and stakeholders on the enhancement of our ESG Policy, initiatives, products and services, and seek their feedback on ESG issues relevant to Quinbrook.

We will develop an employee awareness and behaviour change program to empower our people to help reduce our individual environmental impacts as responsible stewards and will lead by example.

Quinbrook will disclose ESG performance by reporting at least annually to our investors on our ESG progress and management of material risks and opportunities. In addition, we will comply with our reporting obligations under relevant environmental laws and regulations.

Through our sponsorships and community programs we will partner with selected organisations that are actively working to protect the environment and educate the community about environmental issues.

We will engage in policy discussions on environmental issues directly and through our industry representatives as we strive to contribute to the improvement of the quality of ESG data available to the global investment market.

Quinbrook Infrastructure Partners (Jersey) Limited

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