

Denham Sustainable Infrastructure

HUMAN RIGHTS POLICY

Denham Sustainable Infrastructure (DSI)'s overall Responsible Investment Policy establishes our commitment to protecting the environment, people and the communities where our portfolio companies develop, construct and operate projects. Our Responsible Investment Policy also iterates our commitment to respecting human rights and our belief that all people should be treated with fairness, respect and dignity.

This **Human Rights Policy**¹ specifically provides further guidance to our Portfolio Companies in the development and implementation of their own human rights policy. This should complement a Portfolio Company's **Anti-Corruption Policy** which covers business integrity.

STANDARDS

Specifically, we expect our Portfolio Companies to manage their activities in alignment with the following:

- **UN Global Compact's 10 Principles**
- **OECD Guidelines for Multinational Enterprises**
- **UN Guiding Principles on Business and Human Rights**, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labor Organization on Fundamental Principles and Rights at Work and the International Bill of Human Rights²
- **IFC Performance Standards** (for operations in non-OECD countries)

Employees

We expect Portfolio Companies to:

- Commit to equal opportunity and treatment for all employees to ensure the elimination of discrimination.
- Strive for a workforce that is both diverse and inclusive.
- Treat all employees with dignity and respect.
- Commit to work against all forms of child labor, modern slavery, harassment, and discrimination, throughout the value chain

Supply Chains

We expect Portfolio Companies to have a Supplier Code of Conduct covering:

¹ This Policy applies to Portfolio Companies in SIF1 and any subsequent Denham Sustainable Infrastructure funds.

² Freedom of Association and Protection of the Right to Organise (1948), Right to Organise and Collective Bargaining (1949), Forced Labour (1930), Abolition of Forced Labour (1957), Minimum Age (1973), Worst Forms of Child Labour (1999), Equal Remuneration (1951), Discrimination (Employment and Opportunity) (1958)

- A commitment to work against all forms of child labour, modern slavery, harassment, and discrimination, throughout the value chain.
- The requirement for contractors, as well as any sub-contractors, to provide safe and healthy working conditions, fair working hours, fair wages and benefits.

Communities

We expect Portfolio Companies to:

- Respect human rights and to take steps to ensure that their operations do not cause negative human rights impact on community members.
- Have a positive impact in the communities where they operate and for example, implement CSR programs.
- Engage with stakeholders, and to implement a grievance mechanism in place to provide all stakeholders a mechanism for raising concerns, complaints, grievances and other feedback.

Due Diligence Process and Ongoing Monitoring

We expect Portfolio Companies to:

- Identify potential risks to human risks in the supply chain (including contractors and suppliers of goods and materials)
- Have processes in place to prevent and mitigate human rights risks.
- Make available a whistleblower policy in place as well as grievance mechanisms for both employees and other stakeholders who may have concerns over human right issues.
- Report any concerns of human right violations to DSI as soon as possible.

DSI has an internal grievance mechanism for employees and this is described in our Human Resources Policy. An external grievance mechanism is provided for external stakeholders on Denham Capital's website.

