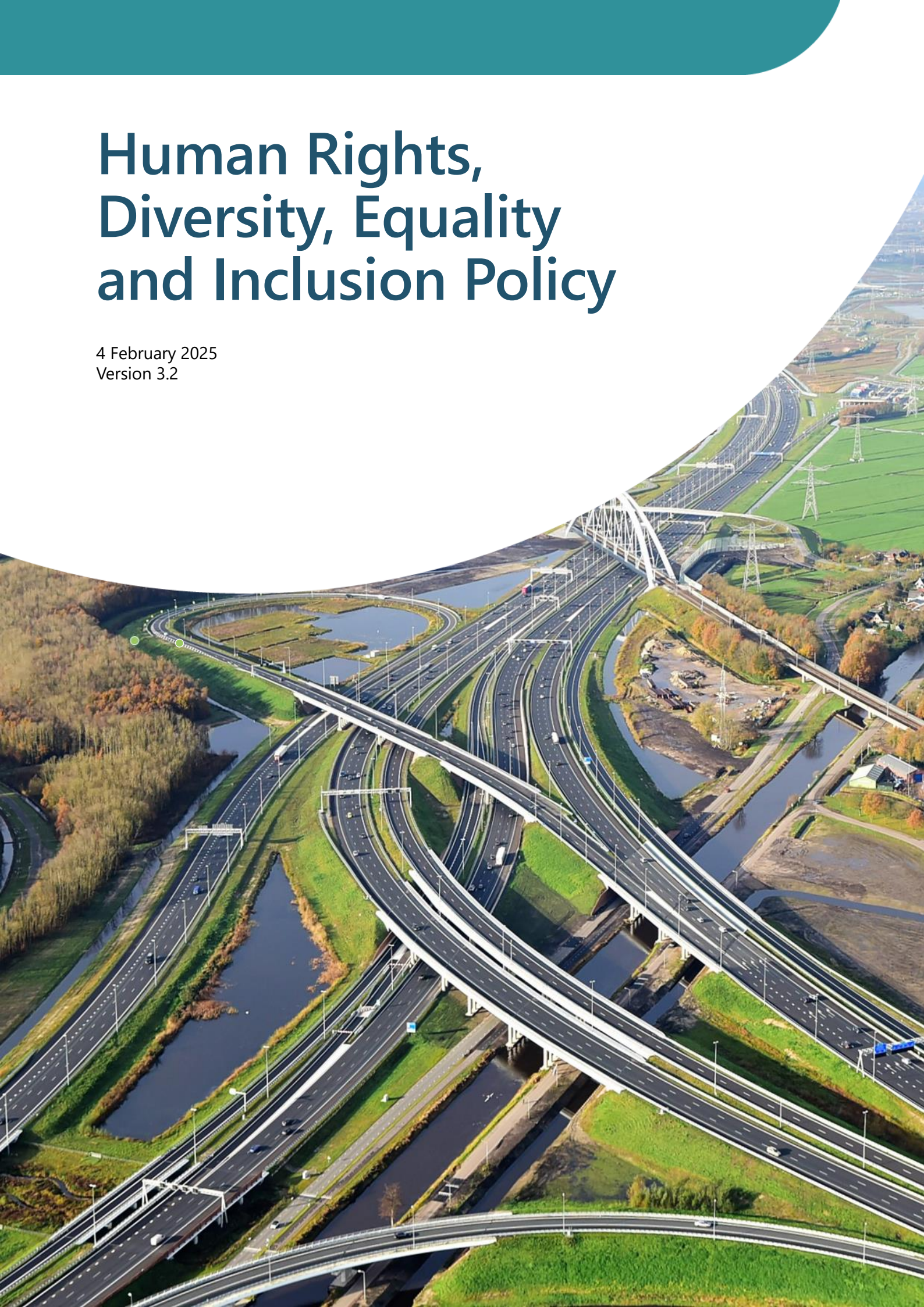


# Human Rights, Diversity, Equality and Inclusion Policy

4 February 2025  
Version 3.2



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## 1. Version control

The Human Rights, Diversity, Equality and Inclusion Policy is to be reviewed on a regular basis by the Management Board and by the Nomination Committee at least annually and updated when necessary.

Version No	Effective Date	Issued By	Incorporated changes
V.1.0	4 September 2020	Management Board / Supervisory Board	Original Document.
V.2.0	04 February 2021	Management Board / Supervisory Board	Amended to include statements promoting diversity.
V.2.1	27 January 2022	Management Board / Supervisory Board	Annual Review 2021. Minor typographical amends. Addition of paragraph on Hampton Alexander and Parker review updates.
V.3.0	28 April 2023	Management Board / Supervisory Board	Annual Review 2022. Addition of Human Rights Policy Renaming the Equality and Diversity Policy into a Human Rights (including Diversity, Equality and Inclusion Policy) Significant additions defining the Company's objectives in this area and the mechanisms to achieve them.
V.3.1	31 January 2024	Management Board/ Supervisory Board	Annual review 2023. Minor wording changes.
V.3.2.	4 February 2025	Management Board/ Supervisory Board	Annual review 2024. Definitions section added Examples of harassment and consequences included. Zero-tolerance policy added Minor wording changes

## 2. Definitions

Abbreviation	Description
<b>BBGI Group</b>	The Company, together with its consolidated subsidiaries.
<b>Boards</b>	Collectively, the Company's Management Board and Supervisory Board.
<b>Company or BBGI</b>	BBGI Global Infrastructure S.A., a <i>société d'investissement à capital variable</i> and registered with the Luxembourg companies and trade register under number B 163879.
<b>Financed Emissions</b>	GHG emissions of BBGI's portfolio companies.

<b>Staff</b>	BBGI Global Infrastructure SA and its consolidated group companies' employees ('BBGI Staff') and directors.
<b>Nomination Committee</b>	The nomination committee of the Company, which comprises all five non-executive directors who are members of the Supervisory Board and review the succession plan for the Company's Boards.
<b>Supervisory Board</b>	The board of independent non-executive directors of the Company.
<b>Management Board</b>	The conducting officers (i.e. the executive directors) of the Company.
<b>Portfolio Company</b>	Both singular and plural; any company, partnership or trust or other special purpose entity formed to undertake an infrastructure project or projects which qualifies as an investment at fair value through profit or loss from an IFRS financial reporting perspective.

## 3. Commitment

BBGI Global Infrastructure S.A. ("BBGI" or the "Company") is committed to cultivating and preserving an organisational culture which implements a policy of support for internationally recognised human rights and seeks to avoid complicity in human rights abuses.

Human rights refer to basic standards of treatment to which all people are entitled. It is a broad concept with economic, social, cultural, political and civil dimensions.

The Company's main responsibilities lie in a number of material human rights areas, connected with operations and/or supply chain<sup>1</sup>: treating employees fairly, employees' rights to equal treatment and inclusion, promoting a diverse workforce and Boards and also aiming to prevent human rights violations in our supply chain.

- BBGI is a signatory of the Ten Principles of the United Nations Global Compact<sup>2</sup> in the areas of Human Rights, Labour, Environment and Anti-Corruption.
- BBGI supports the principles contained within the Universal Declaration of Human Rights<sup>3</sup> and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work<sup>4</sup>.
- The Boards of BBGI give due consideration to both the gender and ethnic diversity of their composition. The goals of the FTSE Women Leaders and the Parker Review on Ethnic Diversity on Boards are fully acknowledged as part of that consideration.
- The Company takes into consideration the best practices outlined in national frameworks, such as the Lëtzebuerg *Chartre de la Diversité*.

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<sup>1</sup> Supply chain is defined as the portfolio companies' underlying agreements with material subcontractors.

<sup>2</sup> <https://www.unglobalcompact.org/what-is-gc/mission/principles>

<sup>3</sup> <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

<sup>4</sup> <https://www.ilo.org/declaration/lang--en/index.htm>

## Zero tolerance

BBGI operates a zero-tolerance policy to any wrongful conduct, including any wrongful conduct mentioned in this policy, and will fully investigate any claims of inappropriate conduct or behaviour towards others. Individuals found to have exhibited such behaviour will face disciplinary action. The severity of the action will depend on the nature of the harassment and may range from verbal or written warnings to suspension or termination of employment. Anyone subjected to such wrongful conduct the discriminative behaviour will be given the full support of the Company and the Management Board and will not themselves be subject to any repercussions discriminated against for raising the issue.

## 4. Putting our commitment into practice

### 1 Diversity, equality and inclusion

BBGI recognises the value of having a diverse workforce from different backgrounds and with different abilities which provides the Company with a 'diversity of thought'. **Diversity** of thought is about recognising how different perspectives, skills, abilities, knowledge, attitudes, and information styles, or a combination of these, inform the Company's approach to solving problems. This diversity can be influenced by many factors whether they be visible (nationality, race, colour, gender, age, ethnicity, civil partnership, education) or non-visible (physical or mental disability, sexual orientation, religious beliefs, cultural and socio-economic background) factors.

BBGI considers **equality** to be the fairness of access, opportunity and advancement for all within an organisation.

**Inclusion** is the state in which any employee can be and feel respected, valued, safe and fully engaged.

BBGI is committed to providing a workplace environment where everyone<sup>5</sup> has an equal opportunity to perform at the highest levels, realise their potential and be recognised for it. This applies to all aspects of the business, employment policies and practices including:

- Recruitment;
- Terms and conditions of employment;
- Compensation and benefits;
- Working conditions;
- Personal development;
- Career progression and promotions.

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<sup>5</sup> BBGI Global Infrastructure SA and its consolidated group companies' employees ('BBGI Staff') and directors.

## 2 Fairness

Treating employees fairly is a core belief at BBGI. The Company strives to provide a safe, respectful and inclusive working environment. All BBGI staff and directors are required to demonstrate the principles of respect, fairness and loyalty in their work with BBGI.

## 3 Non-discrimination

BBGI respects each individual's human rights and will not discriminate on the basis of visible (nationality, race, colour, gender, age, ethnicity, civil partnership, education) or non-visible (physical or mental disability, sexual orientation, religious beliefs, cultural and socio-economic background) factors.

All BBGI Staff and directors shall work in a respectful work culture and are treated fairly. These expectations include:

- respect for each individual and rejection of discrimination in any form;
- contributing to a respectful environment and interactions, enabling everyone to perform to their maximum potential;
- appreciation for all individuals as a sign of tolerance and openness, and as a practical necessity for the Company to succeed as an international organisation.

## 4 Board members appointment/diversity of boards

The process of appointing any new directors is led by the Nomination Committee. In recruiting new directors, the Nomination Committee actively seeks greater diversity of gender, ethnicity, nationality and other criteria, whilst remaining committed to selecting members on merit with relevant and complementary skills to help the Company maximise stakeholder value. The Company will continue to make future appointments at all levels on the basis of the full merits of the individual candidates, and the strengths, skills and experience that they would bring to the composition and balance of the boards or the Company as a whole.

## 5 Freedom of association/collective bargaining

BBGI respects BBGI Staff's rights to join, form or not join a labour union without fear of reprisal, intimidation or harassment. The right to freedom of association and the effective recognition of the right to collective bargaining are legally protected rights in the countries where BBGI operates.

## 6 Harassment

Harassment can be any offensive act, comment or display that humiliates, insults or causes embarrassment, or any act of intimidation or threat. The Company is committed to providing all BBGI Staff and directors with a working environment free of all forms of harassment or bullying, whether that be physical, verbal, sexual or psychological in nature, or any other form.

Examples of harassment include, but are not limited to:

- **Verbal harassment:** inappropriate jokes, offensive comments about someone's gender, race, or sexual orientation, or insults and threats.
- **Sexual harassment:** unwelcome sexual advances, inappropriate touching, or sharing explicit content.
- **Psychological harassment:** Persistent demeaning behaviour, threats, or actions that damage an individual's emotional well-being.
- **Physical harassment:** Any unwanted physical contact, threats of violence, or aggressive behaviour.

The Company is committed to maintaining compliance with legal provisions and will take immediate and appropriate action if any individual is the victim of harassment or bullying. This extends to interactions with third parties such as clients, customers, contractors and visitors. Harassment, whether by or towards third parties, is strictly prohibited and will be addressed in the same manner as internal incidents.

## 7 Occupational health and safety

BBGI is committed to the health, safety and wellbeing of BBGI staff and directors.

As a responsible employer, it is morally right to ensure employees are protected and have a safe working environment. The Company recognises the importance of both the physical health and safety, and the mental well-being of BBGI Staff and directors.

The Company aims to be compliant with all applicable health and safety legal requirements. Best practice health and safety management standards are implemented and maintained across the Company.

BBGI adopts strategies to minimise personal health and safety risk across our operations, such as providing and maintaining safe physical environments, equipment and systems. All BBGI staff and directors have roles to play in building a safe working environment, including the identification of possible workplace practices, actions or incidents which may cause, or contribute to, the mental illness of workers and take actions to eliminate or minimise these risks.

- Appropriate policies, procedures and safeguards are in place and put into practice by the Management Board. This includes making sure that BBGI Staff and directors have access to appropriate information, instruction, training and supervision.
- BBGI staff and directors have a responsibility to help create a healthy and safe working environment.
- BBGI staff and directors are expected to take responsibility for their own safety and are encouraged and empowered to report any concerns.

## 8 Supply chain

BBGI follows the terms of its Responsible Contractor Policy when selecting independent subcontractors. This Responsible Contractor Policy describes the Company's standards of environmental, social and governance performance within the supply chain.

## 9 Anti-Slavery and Human Trafficking

BBGI produces a UK Modern Slavery statement each year, setting out the Company's standards and values in relation to slavery and human trafficking. Portfolio Companies are encouraged to adopt similar provisions to those set out in this statement.

## 5. Raising complaints

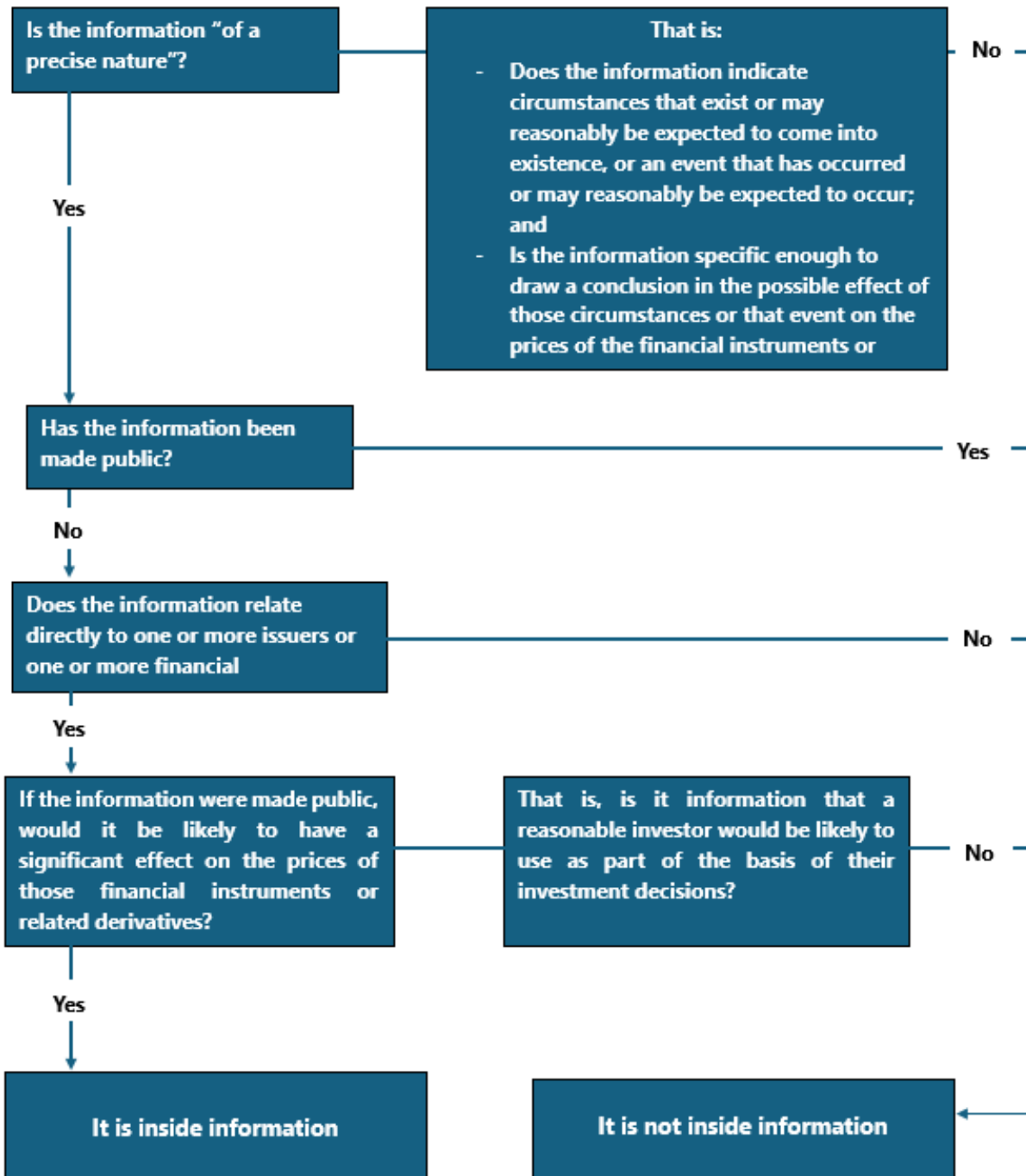
Any individual who is subjected to, witnesses, or believes they may have been subjected to, any acts contrary to this policy is encouraged in the first instance to raise it with the Management Board.

In the event that the incident involves the Management Board, or the individual does not feel comfortable to raise it with them, they may as an alternative make use of the confidential whistleblowing service, details of which are contained in the Company's Whistleblowing Policy, to which all BBGI Staff have access.



## PRACTICAL LAW

### Is it inside information?



## 6. Legal

BBGI will at all times look to adhere to good practice guidance on human rights, diversity and equality, whilst ensuring compliance with relevant Luxembourg legal requirements. Should there be any conflict between t

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