Responsible Contractor Policy

22 November 2024 Version 1.3

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1.Version control

The Responsible Contractor Policy is to be reviewed on a regular basis by the Management Board on a regular basis and updated when necessary.

| Version No | Effective Date | Issued By | Incorporated Changes |
|------------|------------------|------------------|--|
| V.1.0 | 7 September 2021 | Management Board | Original Document. |
| V.1.1 | 15 December 2022 | Management Board | Annual Review 2022. Adding the definition of 'supply chain' Alignment with style and format of other CPP. |
| V.1.2 | 14 December 2023 | Management Board | Annual Review 2023. Minor wording changes. |
| V.1.3 | 22 November 2024 | Management Board | Annual Review 2024. Definitions added, numbering change. |

2. Definitions

| Abbreviation | Description | | |
|--------------|--|--|--|
| 2013 Law | Law of 12 July 2013 on alternative investment fund managers, as amended. | | |
| BBGI/Company | 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. | | |
| Supply Chain | Defined as the special purpose company ('Portfolio Company') that entered into a project agreement with BBGI clients and various ancillary agreements with material subcontractors. | | |

3.Introduction

BBGI Global Infrastructure S.A. ("BBGI") continuously strives to achieve excellence with respect to its contracting practices, because it believes that adequately compensated and trained workers deliver high-quality products and services.

This document describes our commitment to ensuring high standards of environmental, social and governance performance within our Supply Chain.

4. Approach

BBGI applies the following Responsible Contractor Policy when selecting independent contractors and subcontractors (collectively, "contractors"):

- Demonstrated skill, experience, dependability, cost, and safety record that is appropriate for the relevant project.
- Provision of fair wages and fair benefits in the context of local market factors.
- Observance of all local, state and national laws including those pertaining to withholding taxes, minimum wage, labour relations, insurance, occupational health and safety.
- Provision of training as necessary to ensure that contractors' personnel have the required skills and certifications to perform the assigned work.
- Maintenance of a workplace health and safety program that meets or exceeds applicable regulations.
- Application of a zero-tolerance approach for human rights violations and incidents. Contractors should:
 - support and respect the protection of internationally proclaimed human rights;
 - make sure that they are not complicit in human rights abuses;
 - uphold the freedom of association and the effective recognition of the right to collective bargaining;
 - eliminate of all forms of forced and compulsory labour;
 - guarantee the effective abolition of child labour;
 - eliminate any form of discrimination in respect of employment and occupation; and
 - work against all illegal corruption.
- Supporting a precautionary approach to environmental challenges and undertaking initiatives to promote greater environmental responsibility.
- Provision of a tolerant work environment free from discrimination and harassment, and inclusive of all, regardless of specific protected characteristics (i.e. gender, age, nationality,

language, education level, disability status, minority, vulnerable group, occupational category).

Throughout our business relationship, contractors providing goods and services to BBGI are expected to be able to notify BBGI of any material breaches to this policy and maintain at least the following policies:

- Bribery and anti-corruption policy;
- Whistleblowing policy;
- Modern slavery policy;
- Cyber Security policy.

The accountability and responsibility for this policy extends to individuals across BBGI in charge of selecting contractors.

Contact

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