

# **Responsible Procurement Policy**

SUSI Partners Group

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# 1. Purpose

SUSI Partners AG, its subsidiaries and affiliates (collectively, "SUSI" or the "Group", and each affiliate a "Group Company") manage collective investment schemes ("SUSI Funds" and each a "SUSI Fund") focusing on clean energy infrastructure investments.

With this Responsible Procurement Policy (the "Policy") we set out our commitment in relation to the SUSI Funds' ethical and responsible business conduct in accordance with the fundamental environmental, social and governance (ESG) considerations which are outlined below. The business conduct and actions of the SUSI Funds are guided by shared values as laid out in our Code of Ethics and Conduct, and this extends to how we manage the SUSI Funds and their investments' related supply chains. This Policy articulates how SUSI aims to integrate ESG considerations into the procurement practices of the SUSI Funds' investments (where applicable), in collaboration with third-party (direct or indirect) suppliers.

# 2. Scope

This Policy outlines SUSI's (acting on behalf of each SUSI Fund) expectations of suppliers and their employees in relation to compliance with the ESG considerations outlined below. A "supplier" refers to any person or entity including:

- contractors of SUSI Funds and their portfolio companies;
- selected sub-suppliers and sub-contractors of SUSI Funds; and
- in all cases, including all employees of such supplier.

# 3. ESG Considerations

## 3.1. Environmental Sustainability

We expect that suppliers comply with all national laws and regulations as applicable in their respective jurisdictions in relation to environmental topics, including having up-to-date environmental licences and permits where relevant.

SUSI, on behalf of the SUSI Funds and their investments, shall exercise a preference to engage with suppliers who have systems and programmes in place to manage and monitor:

- their own supply chain risks and impacts, particularly on responsible sourcing of minerals and raw materials for their products;
- their use of resources (energy, water, raw materials) and related efficiency, including innovation in design to incorporate GHG resource efficiency measures;

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- their waste production, minimisation, and recycling; and
  - greenhouse gas emissions and reduction.

### **3.2. Social Responsibility**

SUSI upholds and respects the fundamental principles set out in the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles for Business and Human Rights.

Therefore, SUSI does not condone, tolerate, finance, or support unethical labour practices such as child labour, forced labour, modern slavery, and human trafficking. Consequently, we expect our suppliers to respect and uphold these fundamental principles in their operations, too:

- **Child labour**  
Suppliers shall employ workers that meet the applicable national regulations on minimum legal age or the ILO Minimum Age Convention No. 138, whichever is higher.
- **Forced labour**  
Suppliers shall not engage in forced labour, bonded labour or involuntary labour, as defined by the ILO.
- **Freedom of association**  
Suppliers shall respect the rights of their employees to freely organise and participate in collective bargaining agreements, to the extent that is legally applicable in the said country of operation.
- **Equal opportunity**  
Suppliers shall promote a fair working environment where all employees, regardless of nationality, gender, religion, age, and ethnicity are treated with equal respect and dignity.
- **Fair compensation**  
Suppliers shall pay their employees fair compensation in accordance with national laws and regulations, including all legally mandated benefits.

### **3.3. Governance on Procurement Conformity**

We expect suppliers to conduct their business operations (including, inter alia, business transactions, and dealings with employees, clients and third parties) with the highest standards of integrity, fairness, and impartiality, and in an ethical, proper, and professional manner. We expect suppliers to strive continuously to safeguard their respective reputations (and by extension that of SUSI and each of the SUSI Funds).

Suppliers shall observe and comply with all applicable laws and regulations in their respective countries of jurisdiction and operation. In cases where the standards in this Policy differ from national

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laws or other applicable regulations or standards, suppliers shall abide by the stricter requirements and bring this promptly to the attention of SUSI.

The procurement process must be fair, transparent, and fit the purpose. The procurement process shall not violate any antitrust laws or anti-competition laws. SUSI does not tolerate illegal, unethical or any form of corrupt behaviour.

Information and data related to procurement activities shall be treated as material information. Suppliers and SUSI shall take reasonable steps to ensure that procurement information and/or data shall be kept confidential at all times.

Any perceived, actual, or potential conflict of interest is to be reported promptly. The Group shall take appropriate steps to manage the conflict of interest.

## 4. Compliance

- Suppliers shall acknowledge that they have read and understood this Policy.
- Suppliers are expected to communicate the requirements of this Policy to their own suppliers.
- Suppliers shall provide SUSI or its relevant Group Company (on behalf of the SUSI Funds, as applicable) in good faith with all information necessary for SUSI to confirm the supplier's alignment with the requirements of this Policy.
- Suppliers shall authorise the relevant Group Company or its authorised representative to conduct periodic checks/audits of its performance in respect of meeting the requirements of this Policy. Suppliers are expected to provide such access to all documents, information and premises as may be reasonably requested in order for such checks/audits to be performed.
- In the case of non-compliance, suppliers shall implement appropriate corrective actions as soon as reasonably possible to meet the requirements of this Policy, but in any case, within 12 months after detection of such non-compliance.
- SUSI, for and on behalf of the SUSI Funds, retains the full right to terminate with cause any business relationship with the supplier if such non-compliance is not cured as indicated above.

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