

GCP Infrastructure Investments Limited (“GCP Infra” or the “Company”)

## Whistleblowing Policy

GCP Infrastructure Investments Limited (the “Company”) is committed to conducting its business with honesty and integrity. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

This policy is intended to encourage Board members or any of the Company’s Stakeholders (or employees of the Company’s Stakeholders) to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviours or practices) without retribution.

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work.

This may include:

- criminal activity;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- bribery;
- financial fraud or mismanagement;
- negligence;
- breach of our internal policies and procedures;
- conduct likely to damage our reputation;
- unauthorised disclosure of confidential information; and
- the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern in good faith relating to any of the above. If an individual has any genuine concerns related to suspected wrongdoing or danger affecting any of the Company’s activities (a whistleblowing concern) he should report it under this policy.

This policy should not be used for complaints relating to an individual’s own personal circumstances, such as the way he has been treated at work.

## **Whistleblowing Procedure**

As the Company has neither executive directors nor employees, the Company will annually consider the whistleblowing policies and procedures that its service providers and investee companies have put in place for their staff to raise concerns about possible improprieties, including in relation to the Company, in confidence.

### Raising a whistleblowing concern

The Company hopes that in the majority of cases, any concerns will be dealt with within the appropriate policies and procedures. However, Board members, and employees of service providers and of the underlying projects/companies in which the Company invests can bring any matters of concern to the attention of the Chairman, by sending an email to [jerseyinfracosec@apexfs.com](mailto:jerseyinfracosec@apexfs.com).

Should the matter of concern, in any way involve, or relate to the Chairman, the matter should be reported to the Senior Independent Director, at the same email address.

Further contact details can be found on the Company' website at <https://www.graviscapital.com/funds/gcp-infra/contact-us>