aberdeen Investments

Concession Infrastructure Whistleblower and Grievance Policy

July 2025

The requirements provided in this Policy are applicable across all of Aberdeen Investments Concession infrastructure markets, funds and mandates and associated operational processes.

Introduction

At Aberdeen Investments we are committed to running the organisation in an honest and transparent way. We understand that enabling and encouraging anyone impacted by our Concession Infrastructure projects to raise concerns about malpractice or misconduct is fundamental to good corporate governance and can help to protect our customers, clients, colleagues, shareholders, communities and the business from financial and/or reputational loss. The purpose of this policy is to enable project stakeholders to speak up and raise a concern. It outlines how concerns will be managed and informs individuals that their concern will be taken seriously and how it will be dealt with.

Our Concession Infrastructure's Sustainability Aims and Objectives

We actively integrate sustainability considerations across the investment lifecycle for our projects, engaging with stakeholders, and actively managing our portfolio.

As set out in the requirements and safeguards of the Concession Infrastructure ESG Policy, our Concession Infrastructure activities will be conducted in line with the following, to the extent applicable and in the absence of equivalent, more stringent, local requirements:

- UN Global Compact's 10 Principles
- International Finance Corporation (IFC) Performance Standards or similar best practice standards, (2012)
- 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 Labour Organisation on Fundamental Principles and Rights at Work and International Bill of Human Rights.

We consider potential affected communities as part of these requirements in our investment assessment and decision making. Project-level grievances and affected community requirements are explicitly stated in the IFC Performance Standards, and our process is set out below.

Project-related grievances

As part of our Sustainability Aims and Objectives, we are committed to appropriate community engagement and acknowledge the potential for grievances to be raised associated with our projects' activities. Such grievances include concerns or complaints raised by an individual or a group within communities affected by the operations of our projects[1]. Both concerns and complaints can result from either real or perceived impacts of a company's operations.

Set out below is our project-level grievance mechanism for affected communities for receiving, evaluating, and addressing project-related grievances.

Project-related grievances mechanism

This grievance mechanism is designed to enable stakeholders including community members to register concerns and grievances, either real or perceived, with the aim of resolving.

If you have a potential concern and/or grievance associated with one of our infrastructure projects, please email us at: **speakup@aberdeeninvestments.com**

We will then proceed to handle your grievance as follows:

i. Receive grievance

We will enter the grievance into a complaints log and assign a number/tracker.

ii. Assess the issue

The grievance will be assessed and assigned to the appropriate Project Company to classify it into a category such as environmental, cultural heritage, land disturbance, health and safety, noise, dust, traffic etc.

Complex projects, for example those that include land acquisition or Indigenous people will have their own more detailed project level grievance policy which will be followed if relevant.

[1] Grievances may also include whistle-blowing type concerns of potential malpractice, see 5 below.

To seek access to these more detailed policies, please ask your Aberdeen Investments representative.

If the alleged grievance or whistleblowing is not related to one of our infrastructure projects or is outside the scope of this policy, we reserve the right to reject the claim, and after a response, below, no further action will be taken.

iii. Respond

Within 14 days of receiving the grievance we, or the Project Company, will write back to the complainant, acknowledge their grievance and provide information of future steps and timings for resolution and actions.

If any additional information is required to help with resolution options, consideration of community preferences, or opportunities for stakeholder engagement, this will be requested either by ourselves or by the relevant Project Company.

iv. Investigate and resolve

Working with our project partners, and using specialist technical advisors as required, we will identify underlying causes and develop an action plan, if required, to prevent similar incidents occurring in the future.

In line with our project stakeholder engagement processes, we, via the Project Company will engage with the complainant/community to provide updates and if appropriate opportunities for involvement in the resolution and to consult on actions.

v. Conclusion

With our project partners, we will monitor the action plan and continue to implement measures to help prevent the grievance from reoccurring.

vi. Further action

If the complainant/community is not satisfied with the resolution, we will escalate to Senior Management to consider further investigation. If still not resolved, the grievance may need to be passed on to a third party for mediation.

vii. Ongoing monitoring and evaluating

As set out in our Concession Infrastructure ESG Policy, we are committed to ongoing monitoring of our projects and stakeholder engagement. See **Concession Infrastructure ESG Policy** for more information.

Project related whistleblowing

We wish to ensure that it is safe and acceptable for individuals to speak up and raise any concern they may have about malpractice or misconduct that they believe maybe occurring in relation to our Infrastructure Investments. Concerns should be raised at an early stage; proof is not required and we would prefer a matter to be raised when it is still a concern. There will be no repercussions for raising a genuine concern, even if it turns out to be unfounded. The policy can be used by external parties such as contractors, their employees or previous employees, suppliers or potential suppliers, users of the facilities or other members of the community.

The policy is primarily for concerns where the public interest is at risk, this can include a risk to customers, clients, workers, suppliers, the wider public or the organisation itself; the person raising the concern is normally not directly or personally affected. Concerns may include, but are not limited to:

- criminal activity
- failure to comply with any legal or regulatory requirements
- financial malpractice, impropriety or fraud
- bribery or corruption
- non-financial misconduct
- breaches of project policies and procedures
- unauthorised disclosure of confidential information
- dangers to health & safety or the environment
- the deliberate concealment of any of these.

Allocation of responsibility for policy implementation

Implementation of this Policy is the responsibility of the Concession Infrastructure Senior Management team. This policy will be reviewed and updated as required. This policy will remain valid until a new revision is published.

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