



RESPONSIBLE INVESTMENT POLICY

Policy Snapshot

QIC believes that environmental, social and corporate governance (ESG) factors have a material impact on long-term investment outcomes.

Considering ESG factors is part of all our investment decision-making processes.

We exercise our voting rights either internally or via our external managers.

We communicate QIC's approach to Responsible Investment on the QIC website and report on our activities to our clients annually.

Company exclusions are considered on a case by case basis.

QIC became a signatory to the United Nations-backed Principles for Responsible Investment initiative (UNPRI) in 2008.

Application

This Policy applies to QIC's Investment teams.

Objective

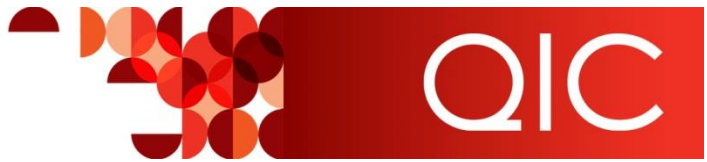
QIC believes that environmental, social and corporate governance (**ESG**) factors have a material impact on the long-term outcomes of investment portfolios and the assets in which we invest.

In our view accounting for ESG risks and opportunities leads to more informed investment decisions. We consider ESG factors in all our investment decisions and through our active asset management to maximise long term outcomes to our clients.

The objective of QIC's Responsible Investment Policy is to support the achievement of sustainable long-term risk-adjusted investment returns across QIC's investment teams through the systematic consideration of ESG factors.

Principles

1. Our fundamental duty is to deliver long term investment outcomes to our clients and **we consider material environmental, social and governance (ESG) factors in all our investment decisions** to build well-informed views of investment risk and opportunity.
2. As an investor in real estate, infrastructure, fixed income and private equity, we understand that **ESG issues vary in type and materiality across asset classes and sectors and we target our ESG approach accordingly.**
3. We invest time in building a detailed understanding of material ESG factors and **we apply our knowledge to develop practical solutions to ESG issues across all our investment portfolios.**



4. **We are an active asset manager and have a longstanding philosophy of engaging with portfolio companies** on their ESG strategy, operations and performance.
5. Generally, **we believe engaging with a company is a more effective responsible investment approach in bringing about outcomes than divestment**, we engage both directly and collaboratively with other investors depending on what's right for the situation.
6. Responsible Investment is an evolving discipline and we work to test, review and **continually improve our ESG approach and integration practices**.

Commitment to the UNPRI

QIC became a signatory to the United Nations-backed Principles for Responsible Investment initiative (**UNPRI**) in 2008. The principles for responsible investment provide guidance on how we can integrate the consideration of ESG factors into our investment decision-making and ownership practices. We are committed to applying the principles in our investment processes.

Responsibilities

The responsibility for the development, implementation and monitoring of this policy sits with the QIC Board.

An ESG Advisory Committee was established in 2017 and is responsible for providing advice to the Board in reviewing and updating this policy, the ESG policy framework and the implementation of this policy across QIC's investment divisions. The QIC ESG Advisory Committee is chaired by a director of the QIC Board.

The QIC Board is responsible for ensuring we meet our commitment to the UN PRI.

Climate Risk

The risks and opportunities posed by observed and projected changes in the climate have the potential to impact the companies and assets QIC invests in. A transition to a low carbon economy further presents a range of implications for businesses and the economy as a whole.

Understanding the risks and opportunities posed by climate changes allows us to make more informed decisions across the asset classes we invest in.

As an investor, we continuously develop and evolve our capacity to manage climate risk on behalf of our clients through processes we are developing to specifically assess our exposure to both physical and transition risks.

As an active asset manager, we engage with portfolio companies to measure and disclose their greenhouse gas (GHG) emissions to understand how they're managing the risks and opportunities posed by climate change.



Modern Slavery

The consideration of human rights and labour practices forms part of QIC's ESG processes. As a minimum requirement, we expect the companies we invest in to comply with all relevant legislation, and reporting requirements relating to human rights risk in supply chains.

In our ongoing monitoring of companies and assets, we consider human rights performance and influence for improved outcomes for people where we have scope to do so and use our leverage as an investor to bring about these outcomes.

QIC is required to report under the Commonwealth Modern Slavery Act 2018 (the Act). Reporting obligations under the Act relate to the steps taken to respond to the risk of modern slavery in our operations and supply chains and those of controlled entities. In addition, as an investor we are required to report on the steps taken to identify and respond to the risk of modern slavery in investment portfolios. Under the requirements of the Act, we will publish a Modern Slavery Statement on an annual basis that describes QIC's approach to identifying and address the risks of modern slavery across our operations, supply chains and investment portfolios.

Exclusions

At times specific company products or activity will be considered for exclusions in a manner that is consistent with QIC's commitment to Responsible Investing. To the extent that these exclusion decisions do not conflict with client investment mandates, QIC will consider such decisions on a case by case basis. QIC's decision to exclude securities from our portfolios is subject to the following criteria:

- International conventions/treaties to which Australia is a signatory
- Australian, National or State law
- Significant policy positions of the Australian or State Government
- Legal status of the product or activity

QIC currently excludes securities involved in the manufacture of tobacco and controversial weapons¹ from our investment portfolios. These exclusions are applied as far as is practically possible and do not apply to derivative indices and pooled investment vehicles.

¹ Controversial weapons are defined as biological and chemical weapons, blinding laser weapons, depleted uranium, cluster munitions, landmines, white phosphorous, and weapons that use non-detectable fragments.



Schedule 1: QIC's Proxy Voting Standard

Intentionally omitted