

Modern Slavery Policy



CONNECTING THE WORLD OF TOMORROW

CONTENTS

PURPOSE 3

Policy Violation and Disciplinary Action..... 4

GLOSSARY 4

Minimum labour standards 4

Investigation, due diligence and risk assessments 5

Training and Communication 5

Raising a Concern 5

PURPOSE

Constructel Group (“**Constructel**”) is committed to respecting internationally recognised human rights and avoiding causing or contributing to adverse human rights impacts, as stated in the UN Guiding Principles on Business and Human Rights. As such, Constructel believes that it is important to respect the human rights of all individuals who work with, or could be affected by, its operations including its suppliers, customers and the communities where it operates. The purpose of this Modern Slavery Policy (the “**Policy**”) is to set out the minimum requirements that those working for and with Constructel must comply with.

Constructel intends that the following guiding principles serve as the basis for its interactions and operations across its business: the Universal Declaration of Human Rights and international conventions, treaties or initiatives, such as the Conventions of the International Labour Organization, the United Nations Global Compact and the Human Rights Council’s Guiding Principles for Companies. We want to ensure that these principles are reflected in our business strategy, day-to-day operations, organisational culture, sphere of influence and relationship with suppliers.

In particular, we view modern slavery as a violation of fundamental human rights, recognised internationally by virtue of the number of countries with criminal laws prohibiting such actions. Consequently, any form of modern slavery is completely incompatible with our values and we support its elimination.

All employees, contractors and everyone who works with Constructel must understand that unlawful or unethical business practices, including any form of modern slavery, will not be tolerated within our business or supply chain.

This Policy is to be read in conjunction with our Code of Ethics and Business Conduct, our Reporting Potential Violations Policy and the modern slavery procedures we have in place.

Application

This Policy was approved by the Board of Directors of Constructel Group on 2022, October 27. Its adoption and enforcement is mandatory for Constructel Visabeira, S.A. and its subsidiaries and covers all activities conducted by Constructel worldwide. It applies to all Group companies, their directors, officers, employees, contractors, suppliers and anyone else acting on Constructel’s behalf in any jurisdiction.

Policy Violation and Disciplinary Action

We take violations of this Policy seriously and strongly encourage that all suppliers and counterparties act in accordance with the letter and spirit of the Policy.

Constructel will view any violation of this Policy by an employee as a significant matter subject to disciplinary action, including termination of employment. Constructel reserves its right to terminate its contractual relationships with any agents, representatives, contractors or other third parties that breach this Policy.

GLOSSARY

Unethical business practices	Anything that falls below Constructel's minimum acceptable standards for business code of conduct, and includes modern slavery
Modern slavery	A violation of fundamental human rights and a criminal offence under the legislation of many countries. It takes various forms, such as servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. In this Policy where we refer to modern slavery, we mean modern slavery in all its forms as well as human trafficking.

REQUIREMENTS

Minimum labour standards

We ensure that all of our people are treated with dignity and respect and that human rights are upheld by Constructel. We have policies and processes in place which aim to ensure that our business operations are conducted in compliance with applicable laws and regulations in the countries where we operate, including relevant human rights related laws and regulations.

All suppliers and counterparties are expected to at least operate to the same minimum standard.

Unethical or unlawful business practices will not be tolerated, either within our business or our supply chain, including but not limited to the following employment practices:

- use of child labour or workers under the legal minimum age;
- failure to provide written contracts of employment in a language understandable for the recipient;
- withholding salaries or deducting wages for reasons beyond the control of the worker;
- confiscation and withholding of original identification and travel documents, except

where required by law (and in which case the process for retrieval of the documents should be clearly explained to those affected); and

- taking retribution against workers who submit complaints or reports on their treatment.

All persons/entities subject to this Policy must ensure that they read, understand and comply with this Policy and are required to avoid any activity that might lead to, or suggest, a breach of this Policy. Any questions about this Policy should be directed to the Group Compliance Officer (compliance@constructel.com).

Investigation, due diligence and risk assessments

As part of our process for appointing suppliers and counterparties, we undertake relevant due diligence and assessments in relation to our contractual counterparties to confirm that they act with business integrity and engage in ethical conduct, in line with the Code of Ethics and Business Conduct. This is further detailed in our Third Party Onboarding Policy.

Training and Communication

Training on this Policy forms part of the induction for all new starters. Thereafter, training on this policy will be delivered every two years. All employees will receive online training on how to identify modern slavery, and how to report in accordance with Constructel’s Policy on Reporting Potential Violations.

Raising a Concern

You have a duty to report concerns about any instance or suspicion of the existence of modern slavery in either the business of Constructel or its supply chain. Concerns should be reported in accordance with Constructel’s Policy on Reporting Potential Violations.

If you are in doubt about whether something constitutes modern slavery, or have any questions in relation to this Policy or any other compliance policy, please consult the Group Compliance Officer (compliance@constructel.com) for further guidance.

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