



QUADRANTE

## SLAVERY AND HUMAN TRAFFICKING

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### PURPOSE

This Policy covers our approach and commitment to Modern Slavery, covering any form of servitude, forced or compulsory labour, child labour and human trafficking.

**This Policy has been prepared in accordance with the UK Modern Slavery Act 2015. It describes the approach adopted by QUADRANTE to prevent slavery and human trafficking from taking place anywhere in its supply chains and in any part of its business.**

**QUADRANTE GROUP (including the QUADRANTE holding company and subsidiaries) has a zero-tolerance policy towards slavery and human trafficking and is committed to acting ethically and with integrity in all its business and commercial relationships.**

The QUADRANTE Group is an independent group of companies providing consultancy services in Sustainability and Environment, Digital, Engineering, Architecture, Construction Supervision and Owner's Engineer to international clients.

With a team of over 550 employees and offices on three continents (Europe, Africa and Latin America) we provide a wide range of design and consultancy services on three major sectors - Energy, Mobility and Sustainable Cities. We believe that the risk of slavery and human trafficking in our business and supply chain is very low.

### APPROACH

This document describes QUADRANTE's policy on the fight against slavery and human trafficking. Our supply chain includes subcontractors, general service providers, travel agencies and professional service providers. In addition, our Code of Ethics and Conduct explains how all suppliers and employees benefit from complying with our expectation of ethical behaviour.

#### Clients

QUADRANTE seeks to work with Clients around the world who share our commitment to complying with the Modern Slavery Act or related legislation adopted internationally.

#### Suppliers and Business Partners

Our suppliers, contractors and business partners are obliged to adhere to the principles of this Policy, as well as QUADRANTE's Policy of Ethics and Conduct, to provide answers to questions we may ask regarding their compliance with this Policy and to co-operate with any audits we may choose to carry out. Likewise, we expect you to demand the same standards, conduct and co-operation from your own subcontractors, suppliers and business partners.

We carry out due diligence in assessing contractors, suppliers and business partners before formalising relationships with them.



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### Employees

We aim to establish a culture of mutual respect among all employees, with equal opportunities and promoting fair recruitment, considering local culture and laws.

We are committed to paying at least the local national living wage to employees and expect our contractors, suppliers, and business partners to do the same.

### Speak up

We encourage employees to report any concerns without fear of reprisal and have provided a specific means (whistleblowing channel) which can be accessed via the Quadrante website: <https://quadranteglobal.com/en/whistleblowing-channel/>

All employees and suppliers are encouraged to speak up if they become aware of any violations of our policies.

## COMMITMENT

Modern slavery is a criminal offence and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and trafficking in human beings in order to exploit them for personal or commercial gain. QUADRANTE has a zero tolerance policy towards any form of slavery or human trafficking, and fully adopts the key principles of the Modern Slavery Act 2015. This Policy sets out our values applicable to Third Parties regarding ethical behaviour when interacting with QUADRANTE, or acting on its behalf.

Although we believe that our risk is extremely low in relation to any issue of slavery or human trafficking, QUADRANTE expects Third Parties to conduct their business lawfully, in full compliance with the Modern Slavery Act 2015 and in accordance with the principles set out not only in our Policy of Ethics and Conduct, in particular:

1. Employees of third parties ("Workers") must work on a voluntary basis. Workers must not be subjected to any form of forced, prison, captive, involuntary, bonded, trafficked or compulsory labour, including forced overtime, and their human rights, in their broadest understanding, must also be respected.
2. Employees must have the right to terminate their employment contract freely, as appropriate, after a reasonable notice period (contractual or otherwise), in accordance with applicable law or collective agreements and without the imposition of any undue sanctions.
3. Employees must not be mentally or physically coerced into carrying out their work.
4. Employees must not have their identity or travel permits, passports or other official documents or any other articles of value confiscated or retained as a condition of employment, and the retention of property must not be used directly or indirectly to restrict Employees' freedoms or to create slavery in the workplace.
5. Fees or costs associated with the recruitment of Employees (including, but not limited to, fees related to work visas, travel costs and document processing costs) must not be charged to Employees, either directly or indirectly.



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6. Employees must have their terms of employment or engagement set out in a written document that is easily understandable to them and that clearly establishes their rights and obligations. These written conditions must be given to the worker before they start work, must be honoured by the employer and must comply with industry standards and the minimum requirements of the applicable legislation and collective agreements where the work is carried out.
7. Wages must be paid regularly and directly to Employees and in legal tender. Payment methods that result in the Employees being deprived of the possibility of terminating the labour contract are prohibited.
8. Child labour must not be used. No one should be hired under the minimum age.
9. Employees, their families and those close to them must not be subjected to cruel or inhuman treatment, including but not limited to physical punishment, physical, psychological or sexual violence or coercion, verbal abuse, harassment or intimidation. Migrant workers, their families and those close to them must not be subjected to discrimination because of their nationality.
10. Employees are free to complain to their employers about their treatment and Employees should not suffer detriment, retaliation or victimisation for making a complaint.
11. When it is necessary to recruit Employees hired through a third party, such as an employment agency, only reputable employment agencies will be admitted. When Employees are hired directly, only reputable employment agencies will be admitted. All these agencies must have the necessary licences and registrations under local laws.
12. The human rights of workers, in their broadest understanding (as described in the European Convention on Human Rights), must also be respected.

## **RESPONSIBILITY**

The QUADRANTE's Group CEO is responsible for the implementation and effective maintenance of this policy. The Managers of each Company ensure that QUADRANTE Group fulfils its obligations on a day-to-day basis and are responsible for monitoring the policy.