QGMI
UNITED KINGDOM

Modern Slavery and Human Rights Statement 2024

compliance

Modern Slavery and **Human Rights** Statement 2024

This Statement is made pursuant to section 54 (1) of the UK Modern Slavery Act 2015 and constitutes QG Construction UK Limited (hereinafter "QGMI") Modern Slavery Statement for the financial year ending on **31st December 2024** (hereinafter the "**Statement**"), year in which QGMI´s annual turnover was approximately £ 5 million.

We recognise that modern slavery and human trafficking are serious human rights violations that affect millions of people around the world. We have a zero-tolerance policy towards any form of slavery, servitude, forced or compulsory labour, or human trafficking in our business and supply chain. We respect and uphold the dignity, freedom and equality of all people and we expect the same from our suppliers, contractors, subcontractors, agents, consultants and other third parties that we work with (hereinafter collectively referred to as "our Suppliers").

Therefore, this Statement sets out the concrete actions taken to assess and mitigate the risk of slavery and human trafficking in our business and supply chain.

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Our **Business** and **Supply Chain**

QGMI is an international business group specialising in engineering and construction, working on all kinds of projects. As an EPC+F company, we have expertise in the design, financial structuring and execution of sustainable civil work projects. Our comprehensive services cover every stage of a project, from design and procurement to construction.

We promote sustainable development wherever we operate because we aim for the social benefit of all our work: enhancing the quality of life of people and enabling them to reach their full potential. Currently, our primary focus is Africa, a continent with great potential for development and transformative social and economic impact.

Our success is driven by our technical expertise, highly skilled teams, and strong partnerships with qualified collaborators and suppliers. We uphold our commitment to corporate social responsibility through our Ethics and Compliance Programme, ensuring integrity and excellence in everything we do. We believe that only by creating opportunities, we can build a better world. To learn more about what we do, our values and compliance overview please visit **www.qgmi.uk**.

Our **Ethics** & **Compliance Program** and **Policies**

At QGMI we have implemented a full-bodied Ethics & Compliance Programme applicable to all our units, that complies with the highest international standards and guides our governance. The Program is certified by ISO 37001 (Anti-Bribery System) and ISO 37301 (Compliance Management System), demonstrating our commitment to prevent, detect and respond to any unethical or illegal conduct in our business and supply chain.

As part of the Program, we have established several policies and procedures that reflect our commitment to preventing modern slavery and human trafficking in our business and supply chain. These include, among others:

Code of Ethics

Sets out the principles and standards of behaviour that we expect from all our employees, directors, officers, and representatives. The Code of Ethics prohibits any involvement in modern slavery and human trafficking and requires reporting any actual or suspected violations to the relevant authorities.

Code of Ethics for Third Parties

It is a document that outlines our expectations and obligations regarding the prevention and detection of modern slavery and human trafficking in our business and supply chain, which must be signed by QGMI's Suppliers. The Code of Ethics for Third Parties requires our Suppliers to commit and comply with the UK Modern Slavery Act 2015 and all other applicable laws and regulations that prohibit modern slavery and human trafficking in any form. QGMI reserves the right to audit and monitor our Suppliers' compliance with the Code of Ethics for Third Parties any time and to terminate our relationship with any Supplier who fails to comply with our standards and expectations.

Whistleblowing Policy

Provides a confidential and anonymous reporting mechanism for anyone who has concerns or suspicions about any wrongdoing, misconduct or malpractice in our business and supply chain. The policy encourages whistleblowers to report any issues related to modern slavery and human trafficking and assures them of protection from retaliation or harassment.

Human Rights Policy

Following our Code of Ethics, we have also adopted a Human Rights Policy that reflects our commitment to respect and uphold the Universal Declaration of Human Rights in our business and supply chain. Our Human Rights Policy includes our basic principles, such as encouraging respect for these rights among our contractors, suppliers and business partners or creating an inclusive workplace and condemning discrimination of any kind.

Our Human Rights Policy is communicated to all our employees and stakeholders and is available on our website. We also provide training and guidance on human rights issues to our employees and suppliers as part of our ongoing awareness and capacity building efforts. We monitor the implementation and effectiveness of our

Human Rights Policy through regular reviews and assessments, and we welcome feedback and sug-gestions from anyone who has concerns or questions about our human rights performance.

Assessing our **Risk** (Due Diligence and Risk Management)

QGMI manages human right through a comprehensive risk assessment that guides our priorities and actions to fight against modern slavery. This risk assessment congregates all risks and controls across the organization, ensuring a strategic approach to prioritising necessary actions.

QGMI recognises that due diligence and risk management are essential steps for identifying and mitigating the potential risk of modern slavery and human trafficking within our business and supply chain.

We have therefore implemented several measures to:

a. Ensure the performance of effective pre-qualification processes (due diligence) for all our Suppliers and,

b. Establish a risk management framework that defines the roles and responsibilities, processes and procedures and reporting and escala-tion mechanisms for managing the risk of modern slavery and human trafficking in our business and supply chain.

The framework aims to ensure that we identify, assess, mitigate, mon-itor, and report on the risk of modern slavery and human trafficking in a consistent, transparent, and proactive manner.

Training on **Modern Slavery** and **Human Trafficking**

One of the main actions we have taken to prevent modern slavery in our operations and supply chain is to provide regular and comprehensive training for our employees. In 2024 we delivered the virtual training and certification “Preventing Human Trafficking” to all our employees as part of the anti-slavery day activities; as a result, 322 employees were successfully trained and certified.

The training covered the definition of human trafficking and modern slavery, applicable laws and regulations, red flags and indicators, responsibilities for the supply chain, and the importance of our Due Diligence y Risk Management Framework as effective strategies to tackle modern slavery and human trafficking. The training also included case studies, quizzes, and interactive discussions to enhance the learning outcomes and increase the awareness and engagement of our participants.

We believe that this training has contributed to strengthening our ethical and compliance culture and empowering our employees to act responsibly and proactively in preventing and addressing any potential or actual cases of modern slavery.

Governance and Compliance

This Statement is made under the responsibility of the QGMI Group's Chief Compliance Officer, the one responsible for overseeing and assuring compliance with the Modern Slavery Act and for the annual preparation of the Modern Slavery Act Transparency Statement, who signs it in conjunction with QGMI Group's Chief Executive Officer.

Gustavo Dantas Guerra
CEO