

# Anti-slavery and human trafficking policy

Quintas Energy Group



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### **Policy Statement**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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 Quintas we have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

# About this policy

The purpose of this policy is to:

(a) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and

(b) provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded employees, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners ("Interested Parties").

## Responsibility for the policy

The Compliance Area of Quintas has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.



All the interested parties are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Area <u>compliance@quintasenergy.com</u>.

#### Interested Parties responsibilities and how to raise a concern

Interested Parties must ensure that read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

They are required to avoid any activity that might lead to, or suggest, a breach of this policy.

The Interested Parties must notify directly the Compliance Area or using the confidential Quintas' Whistleblower Channel as soon as possible if believe or suspect that a breach of this policy has occurred or may occur in the future.

We encourage Interested Parties to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

In case there is a believe or suspicion that a breach of this policy has occurred or that it may occur it must be immediately reported it in accordance with Quintas' Whistleblowing Policy.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with a manager, the Compliance Area or through Quintas' confidential <u>whistleblower channel</u>.

#### Training and communication

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

This policy was approved on 12 September 2024 by the board of directors of Quintas Energy, S.A. and shall be periodically reviewed.



SEVILLE LONDON MIAMI ROME BRISBANE CORK