

## MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Modern slavery and human trafficking is any form of forced labour, child labour, debt slavery, human trafficking, or other forms of exploitation of individuals. At GRANORTE, we are committed to combatting modern slavery and human trafficking in all its forms. We recognize that these crimes pose a grave violation of human rights and are determined to ensure that our business operations and supply chains are free from any involvement in such practices. This Modern Slavery and Human Trafficking Policy outlines our commitment to prevent, detect, and address any potential risks of modern slavery and human trafficking. This policy applies to all aspects of our business, including our employees, customers, suppliers, and other business partners.

### Compliance with Laws and Regulations:

We will comply with all applicable laws, regulations, and international standards relating to modern slavery and human trafficking. This includes but is not limited to The European Convention on Human Rights, UK Modern Slavery Act 2015, the California Transparency in Supply Chains Act, International Labour Organization Forced Labour Convention and Abolition of Forced Labour Convention, and any other relevant legislation in the jurisdictions where we operate.

### Risk Assessment:

We will conduct regular risk assessments to identify potential modern slavery and human trafficking risks within our business and supply chains. This will include an evaluation of our own operations as well as those of our suppliers and business partners. We will ensure that our suppliers and contractors uphold the same commitment to combatting modern slavery and human trafficking.

### Customers and Suppliers:

We expect our customers and suppliers to adhere to the same high standards of ethical conduct and respect for human rights that we uphold. We will establish and maintain transparent and responsible relationships with our customers and suppliers, ensuring that they have appropriate policies and controls in place to address modern slavery and human trafficking risks.

### Reporting and Whistleblower Protection:

We encourage all employees and stakeholders to report any concerns or suspicions of modern slavery or human trafficking through our designated reporting channels. Whistleblowers will be protected from retaliation, and their reports will be handled confidentially and with appropriate investigation and action.

### Continuous Improvement:

We are committed to continually improving our efforts to combat modern slavery and human trafficking. We will review and update this policy periodically to reflect changes in laws, regulations, and best practices. We will seek feedback from employees, stakeholders, and external experts to drive ongoing improvement in our approach to eradicating these crimes.



This Modern Slavery and Human Trafficking Policy reflects our commitment to preventing and addressing modern slavery and human trafficking in all our business operations and supply chains. By adhering to this policy and promoting transparency, collaboration, and responsible sourcing, we aim to contribute to the eradication of these heinous crimes and uphold the rights and dignity of all individuals.

This policy statement is communicated to employees and stakeholders and it is publicly available.

Approved on April 28, 2023

A handwritten signature in black ink, consisting of a stylized 'E' followed by a series of loops and a long horizontal stroke.

Eduardo Figueiredo  
Managing Director