## Zero Bypass Limited,

a company with its registered seat at CMS Cameron Mckenna LLP, Cannon Place, 78 Cannon Street, London, EC4N 6AF, United Kingdom, registered at Companies House under number 9905508,

acting through its branch office **Zero Bypass Limited, organizačná zložka**, with its registered seat at Odborárska 21, 831 02 Bratislava – mestská časť Nové Mesto, Slovak Republic, Identification No.: 50 110 276, registered with the Commercial Register of the District Court Bratislava I, Section Po, File No.: 3188/B

# Modern slavery statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 for the financial year ending 31/12/19 and sets out the steps that Zero Bypass Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Zero Bypass Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our business

Zero Bypass Limited, is a consortium incorporated under the laws of England and Wales and consisting of international companies Cintra Infrastructures, Macquarie Capital, Aberdeen Investments and PORR AG. According to the Concession Agreement concluded with the Slovak Republic, represented by the Ministry of Transport and Construction of the Slovak Republic, the consortium is responsible for design, construction, financing, operation and maintenance of D4 highway sections Jarovce – Rača and R7 expressway sections Bratislava Prievoz – Holice, as a PPP Project in Slovakia.

## Our high-risk areas

We aim to reduce the risk across our own company by limiting our suppliers and subcontractors, ensuring that each can be vetted on an individual basis. Our high-risk areas are sub-contractors and suppliers who deal with third party manufacturers. We limit the risk by only using suppliers which have a clear supply chain and by vetting each sub-contractor on an individual basis and by continuous monitoring.

## Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- 1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- 2. Recruitment policy. We operate a robust recruitment policy for all employees to safeguard against human trafficking or individuals being forced to work against their will.

- 3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- 4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

# Our suppliers

Zero Bypass Limited operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- 1. They have taken steps to eradicate modern slavery within their business
- 2. They hold their own suppliers to account over modern slavery
- 3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- 4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
- 5. We may terminate the contract at any time should any instances of modern slavery come to light.

#### **Training**

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

• No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

#### Approval for this statement

This statement was approved by the Board of Directors who will review and update it annually.

Name: Jaime P. Lamela Pascua, head of branch

Signature:

## Zero Bypass (Holdings) Limited,

a company with its registered seat at CMS Cameron Mckenna LLP, Cannon Place, 78 Cannon Street, London, EC4N 6AF, United Kingdom, registered at Companies House under number 10196807,

# Modern slavery statement for financial year 2019

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 for the financial year ending 31/12/19 and sets out the steps that Zero Bypass (Holdings) Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Zero Bypass (Holdings) Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

#### Our business

Zero Bypass (Holdings) Limited incorporated under the laws of England and Wales as Zero Bypass Limited's sole shareholder (a consortium responsible for the design, construction, financing and operation of the southern part of the Bratislava Bypass in Slovakia) is the company with the activities of head offices.

## Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- 5. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- 6. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- 7. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

### Our suppliers

Zero Bypass (Holdings) Limited operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- 6. They have taken steps to eradicate modern slavery within their business
- 7. They hold their own suppliers to account over modern slavery
- 8. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- 9. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
- 10. We may terminate the contract at any time should any instances of modern slavery come to light.

## Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

#### Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

• No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

#### Approval for this statement

This statement was approved by the Board of Directors who will review and update it annually.

Name: Jaime P. Lamela Pascua upon Power of Attorney

Signature: