



QUADRANTE GROUP

SLAVERY AND HUMAN TRAFFICKING STATEMENT

First issue

Lisbon, 10 September 2018



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REVIEW	DATE	DESCRIPTION
0	10/9/2018	First issue

QUADRANTE GROUP

SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement has been prepared in accordance with the UK Modern Slavery Act 2015. It describes the approach taken by QUADRANTE UK Limited (“QUADRANTE”) to prevent slavery and human trafficking to take place in any part of its supply chains and any part of its business.

QUADRANTE GROUP (including QUADRANTE, the holding company and affiliates) has zero tolerance policy in relation to slavery and human trafficking and is committed to acting ethically and with integrity in all our business dealings and relationships.

QUADRANTE Group is an independent set of firms providing engineering and architecture consulting services to international clients.

With a team of 170 employees and offices in three continents (Europe, Africa, and Latin America) we have developed a wide range of Project and Consulting Services in the following areas: Buildings, Transports, Industry and Energy, Hydraulics, Environment, New Cities and Airports.

We believe the risk of slavery and human trafficking in our business and supply chain is very low.

1 RESPONSIBILITY

The Group’s CEO is responsible for the effective implementation and maintenance of this policy.

General managers ensure QUADRANTE meets its obligations on a day-to-day basis and are responsible for monitoring the policy.

2 APPROACH

QUADRANTE’s policy dealing with anti-slavery and human trafficking can be found in this document. Our supply chain includes sub-consultants, general business suppliers, travel agencies and professional services providers. Also, our Code Ethics and Conduct explains the benefit of all of our suppliers and our employees our expectation regards ethical behavior.

CLIENTS

QUADRANTE seeks to work with Clients around the world who share our commitment to meet the Modern slavery Act or international affiliate legislation.

SUPPLIERS AND BUSINESS PARTNERS

Our suppliers, Contractors and business partners are required to adhere to the principles in this Policy as well as QUADRANTE’s Code of Ethics and Conduct, to provide responses to questions that we may ask related to their compliance with this Policy and to engage with audits which we may choose to undertake. Similarly, we expect them to require the same standards, conduct and co-operation of their own Sub-Contractors, suppliers and business partners.

We undertake appropriate due diligence in evaluating contractors, suppliers and business partners before formalizing relationships with them.

EMPLOYEES

We seek to have a culture of mutual respect among all employees, with equal opportunities promoting fair employment, 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 AND WHISTLEBLOWER

We encourage staff to raise concerns without fear of reprisal and provide a number of communications channels for this purpose. All employees and suppliers are encouraged to speak up if they become aware of any breaches to our policies.

3 COMMITMENT

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 in order to exploit them for personal or commercial gain. QUADRANTE has a zero tolerance policy in relation to any form of slavery or human trafficking, and fully embraces the key principles of the Modern Slavery Act 2015.

This Policy sets our values as they apply to Third Parties for ethical behaviour when interacting with QUADRANTE, or when acting on its behalf.

Although we think our risk is extremely low regarding any slavery or human trafficking issues, 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 within our Code of Ethics and Conduct, and in particular:

1. Employees of Third Parties (“Workers”) must be working voluntarily. Workers shall not be subject to forced, prison, bonded, indentured, slave, trafficked or compulsory labour in any form, including forced overtime and their broader human rights shall also be respected.
2. Workers must have the right to terminate their employment freely, as appropriate following a reasonable period of notice (contractual or otherwise) in accordance with applicable laws and collective agreements and without the imposition of any improper penalties.
3. Workers shall not be mentally or physically coerced to provide their labour.
4. Workers shall not have their identity or travel permits, passports, or other official documents or any other valuable items confiscated or withheld as a condition of employment and the withholding of property shall not be used directly or indirectly to restrict Workers’ freedoms or to create workplace slavery.
5. Fees or costs associated with the recruitment of Workers (including but not limited to fees related to work visas, travel costs and document processing costs) shall not be charged to Workers whether directly or indirectly.
6. Workers shall have their terms of employment or engagement set out in a written document that is easily understandable to them and which clearly sets out their rights and obligations. Such written terms shall be provided to the worker in advance of them starting work, shall be honoured by the employer and shall meet industry standards and the minimum requirements of applicable laws and collective agreements where the work is carried out.
7. Wages should be paid regularly and directly to Workers and in legal tender. Methods of payment that have the effect of depriving the Worker of the ability to terminate employment are prohibited.



8. There shall be no use of child labour. Nobody shall be employed under the minimum age.
9. Workers, their families and those closely associated with them shall not be subject to harsh or inhumane 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 closely associated with them should not be subject to discrimination due to their nationality.
10. Workers shall be free to file grievances to their employers about the employer's treatment of them and Workers shall not suffer detriment, retaliation, or victimization for having raised a grievance.
11. Where it is necessary to recruit Workers who are engaged via a third party, such as an employment agency, then only reputable employment agencies shall be engaged. Where Workers are sourced to be employed directly, only reputable recruitment agencies shall be engaged. All such agencies must have the necessary licences and registrations under local laws.
12. Workers' broader human rights shall also be respected (as outlined in the European Convention on Human Rights).

4 DISCLOSURE

All policies are available upon request or accessible through our [website](#).

A handwritten signature in black ink, appearing to read "Nuno Costa".

Nuno Costa
CEO – Quadrante Group