

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Modern slavery ("**Modern Slavery**") is a serious and organised crime and a violation of fundamental human rights. It can take various forms, including slavery, servitude, forced and compulsory labour, child labour and human trafficking, all of which have in common the deprivations of a person's freedom by another in order to exploit them for personal or commercial gain. Modern Slavery destroys communities and causes significant harm to victims.

Egis SA (hereinafter "**Egis**", "**we**" or "**our**") believes in acting ethically, with honesty, transparency and impartiality in all its business dealings and relationships and expects the same high standards from its partners, associates, contractors, subcontractors, suppliers, agents, workers and intermediaries (a "**Partner**" or "**Partners**") and supply chains.

We take a zero-tolerance approach to Modern Slavery and are committed to implementing, maintaining and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our own business and supply chains.

As an equal opportunity employer, we are also committed to creating and ensuring a healthy, safe, non-discriminatory, and respectful environment for all our employees wherever they are located.

Scope of this Statement

This Modern Slavery and Human Trafficking Statement has been prepared on behalf of Egis SA and its subsidiaries for the financial year (ending 31 December 2024). This Statement sets out the steps taken by Egis to identify and reduce the risk of Modern Slavery occurring within our global business and supply chains.

Some Egis subsidiaries which operate in countries that impose specific Modern Slavery legal and compliance requirements (such as the UK, Australia and New Zealand) have in place additional processes to meet such requirements and ensure they apply the best practices in such country.

Our Organisation, Structure and Supply Chains

Egis is a global consulting, construction and engineering company with operations in over 100 countries worldwide.

Egis, via its subsidiaries, suppliers and partners, provides services for governments, businesses and organizations in the areas of transport, urban development, construction, industry, nuclear, water, environment and energy, supporting them throughout the world from the inception phases of their projects to completion and beyond. In some instances, Egis also acts as an investor in the projects in which it is involved.

Egis's ultimate parent company is Egis SA which has its headquarters in Guyancourt, France.

Egis also operates joint ventures with strategic partners in many areas of its business. Whilst each joint venture will set its own ethics rules, Egis requires all its co-contractors in temporary consortia led by Egis to comply with its [Partners Code of Integrity](#) (the "**Partner Code**").

Egis' supply chain comprises plant, vehicles and equipment suppliers, subcontractors and various service providers, manufacturers and suppliers of goods and materials worldwide. All Egis' procurement of services and supplies is undertaken by professional procurement specialists within Egis or its subsidiaries, who work closely with Egis' Ethics and Compliance Teams.

Our Policies

Egis sets high expectations for the procurement of goods and services on its behalf and that of its subsidiaries. We aim to build long term sustainable relationships with our Partners so that their activities and that of their supply chains are undertaken in a manner consistent with Egis' principles of honesty, transparency and fairness and do not condone Modern Slavery or similar practices.

Egis requires all its Partners to undertake to comply with the Partner Code (a copy of which is available in nine languages: French, German, English, Spanish, Portuguese, Polish, Arabic, Hindi and Chinese) and to ensure their own co-contractors, subcontractors and suppliers give the same undertaking.

Our Partner Code specifically requires our Partners to respect human rights and the fundamental principles of freedom of association and non-discrimination in the workplace, in line with the ILO's Fundamental Conventions. This includes the prohibition on forced and child labour.

Our Partner Code also requires our Partners to undertake to provide their employees with safe and healthy working conditions which is specifically stated to include providing sufficient and good condition safety equipment and ensuring that safety instructions are adhered to in all Egis projects, irrespective of local practices.

These core Egis commitments are further reiterated in Egis Sustainable Development Charter (the "Charter") which echoes Egis' core values of social responsibility, humanity and creativity and is itself based on a body of internationally recognised texts such as The Universal Declaration of Human Rights, ILO's Fundamental Conventions, the UN Guiding Principle on Business and Human Rights, the OECD Guideline for Multinational Enterprises, and the Ten Principles of the UN's Global Compact which Egis has signed up to. This is in addition to the voluntary commitments signed by SYNTEC Ingénierie (Federation of engineering professionals) with France's Ministry for Ecology and Sustainable Development.

Our Partner Code and Charter seek to commit all Egis Partners worldwide to abide by the same internationally recognised standards on human rights and employment practices, including those relating to non-discrimination, child and forced labour prohibitions, working hours, remuneration and diversity and inclusion.

In addition to our Code and Charter, Egis has several internal policies, specifically aimed at Egis employees, that set out the common rules of behaviour expected of all members of staff and assist them in handling day-to-day situations that arise (or may arise) in their professional lives.

Egis' Code of Ethics and Egis' Code of Integrity define the standard of behaviour that is expected of each Egis employee and outline Egis' preventative and informative measures to promote integrity in all Egis' activities.

The Egis Human Resources Management Code ensures that all employees observe the highest personal, ethical and professional standards in everything they do and operate with integrity and respect at all

times. These are underpinned by Egis' Grievance Policy.

Egis' internal Whistleblowing Policy encourages anyone who suspects wrongdoing, including modern slavery abuses, to report it as soon as possible, in the knowledge that concerns will be dealt with confidentially, taken seriously and investigated as appropriate. The policy also covers the protection of whistle blowers.

All the above codes and policies ("**Policies**") form part of the Egis Book which each of our subsidiaries is mandatorily required to implement within their own businesses during the integration phase. In countries that impose specific Modern Slavery legal and compliance requirements, some Egis subsidiaries have supplemented the Policies with their own local codes and procedures.

Copies of such Policies, and relevant updates of the same, are provided and made available to all Egis' Partners and employees.

Our Due Diligence Process

Egis' due diligence and risk assessment is conducted by Egis subsidiaries operating in the relevant region, working closely with the Ethics and Compliance Teams (and in particular the Ethics & Compliance Network, as described below).

The process is thorough and robust and is conducted in respect of all core Egis Partners regardless of their location, size and turnover in order to identify, assess and monitor potential risk areas in their business and supply chains.

Our Risk Assessment and Management

Once appointed, as part of the onboarding process, **new key Egis Partners** are given a copy of the Partner Code and required to undertake in writing to comply with its provisions in all respects and, in particular, adhere to Egis' commitment to protecting the health, safety and security of all employees, pay them a fair wage, provide adequate working conditions and respect the human rights of anyone, whether employees, client and others, who could be affected by their activities.

Egis will reinforce these requirements in the contractual terms and conditions entered into with such Partner, which (among others) will:

- provide that the Partner shall perform all its contractual obligations in compliance with all applicable laws and shall maintain its own policies and procedures to ensure compliance with the rules of integrity specified in the Partner Code; and
- specify that, where necessary and appropriate, including in respect of a situation of legal or policy non-compliance, Egis may terminate the contract, such steps to be in addition to any other action that Egis may deem necessary depending on the gravity of the circumstances.

In countries that impose specific Modern Slavery legal and compliance requirements, some subsidiaries require their Egis' Partners to complete a Modern Slavery Questionnaire, have in place a Modern Slavery Policy, conduct annual staff training and undertake regular audit.

As part of the onboarding process, **new Egis employees** are given access to the Egis Book, including

the Egis Code of Ethics and Code of Integrity. Egis employees are also required to complete a mandatory, dedicated online ethics training module.

Egis implemented an IT tool and whistleblowing system, now called [Egis Integrity Line](#), which is available to all employees worldwide as well as external third parties. Among other features, this platform enables Egis to gather at any time consistent data on incidents reported, facts or situations in breach with Egis' Code of Ethics or Code of Integrity. All Egis employees are encouraged to report any incident to their line manager or to the Director of Ethics and Compliance. Some Egis subsidiaries also have in place additional whistleblowing and reporting procedures that supplement Egis Integrity Line and reinforce the ethics principles set out in the Codes and policies.

Egis SA's Ethics & Compliance Teams, which forms part of Egis Group's Legal Team, has overall responsibility for Egis' approach to Modern Slavery and is structured as follows:

- The Ethics & Compliance Committee, Egis' highest ethical decision-making body, which is led by Egis' Chief Executive Officer;
- The Ethics & Compliance corporate department, which is led by the Group Director of Ethics & Compliance; and

The E&C network operates at region and business line levels and ensures clear communication and alignment between Egis SA's ethics strategy and compliance and those of the Egis subsidiaries. Each member of the network is responsible for ensuring the implementation of the Group robust compliance processes and procedures, in line with local legislation and requirements, and reports to the Group Director of Ethics and Compliance.

Egis is constantly improving its processes and has introduced an annual mapping review procedure to identify, assess, reduce and monitor the risk of Modern Slavery occurring within its operations and supply chains. The results of these reviews drive amendments to the Partner Code but also to Egis' employees' Code of Ethics and Code of Integrity.

Our Key Performance Indicators to Measure Effectiveness in combating Modern Slavery

Egis recognises that, in the event of actual or alleged non-compliance with, or a suspicion of violation of, the Partner Code by a Partner, termination of the contract is one of a range of responses available and that, in some cases, depending on the gravity of the non-compliance, this may not be the most sustainable or effective response. Therefore, unless the breach is so serious that action or reporting must be taken immediately, Egis will follow a phased approach which will start with discussions at senior and leadership team level.

Egis also requires all its business Partners that suspect or become aware of an actual breach of any of the rules set out in the Code by one of their employees, an Egis employee, a client or another Partner, to promptly notify its Egis contact or the Egis Ethics & Compliance Director directly or through Egis Integrity Line. Any notification will be handled with great care, respecting confidentiality and ensuring that the person who raised the alarm in good faith is not then subject to reprisals.

The key performance indicators used by Egis to measure the effectiveness of its processes to combat Modern Slavery within its business and supply chains include:

- the rate of concerns or non-compliances, reported by employees and Partners through the reporting channels provided;
- satisfactory outcome to regular compliance meetings, contracts and project reviews with Partners;
- rate of ad hoc investigations required by Egis Ethics and Compliance Teams as a result of allegations of non-compliance or breach by Partners and nature of the responses received from them and remedial actions taken (which may include contract termination).

In 2025, Egis will continue to rely of these main KPIs to measure its effectiveness in reducing the risk of Modern Slavery taking place in its business and supply chains.

Our Employee Training and Awareness Raising

Raising awareness of Modern Slavery is key to identifying and helping prevent Modern Slavery in Egis' business and supply chains.

Egis requires all its employees to complete mandatory online trainings: *Business Ethics* and *Ethics in Action*. The latter is available in 6 languages (French, English, Spanish, Portuguese, Polish, Chinese.).

In 2025, a new mandatory training module will replace the two previously mentioned modules: *Ethic & Compliance Pass*. The latter will be available in 5 languages (French, English, Spanish, Portuguese and Polish).

In some countries that impose specific Modern Slavery legal and compliance requirements, this training has been supplemented by specific mandatory Modern Slavery training for all staff.

In 2025, these mandatory requirements will continue to be implemented across Egis, with all Egis employees being obliged to complete the training and attest to having read the updated Policies.

Egis takes its responsibility to help governments eradicate modern slavery and human trafficking very seriously.

This Statement has been considered and approved by the Board of Directors of Egis SA.

A handwritten signature in blue ink, appearing to read 'Laurent Germain', with a horizontal line underneath.

Signed for and on behalf of Egis SA
by Laurent Germain
Chief Executive Officer, Egis SA
on 30th September 2025