

# Slavery and Human Trafficking Statement

April 2024



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# 1 > Summary

This statement is made pursuant to section 54, subsection 1, of the Modern Slavery Act 2015 and constitutes Cox Group Slavery and Human Trafficking statement for 2024.

Cox Group recognizes that it has a responsibility to take a robust approach to slavery and human trafficking and indeed takes a zero tolerance to non-compliance in this matter in any part of its business or its supply chain. This position is clearly stated in Cox Group 's internal policies.

The company is committed to fulfilling its obligations under the Modern Slavery Act and to keep on improving transparency, to protect vulnerable workforce and prevent potential human rights violations.

Although the modern slavery risks are minimal within the company, these risks could exist in the global supply chain, so Cox Group is implementing different measures to ensure it never happens.

For the moment, no evidence has been found of modern slavery in the company's supply chain.

This statement applies to every activity carried out by the companies under the control of Cox Group during 2024.

# 2 > Organizational Structure

## Business and Internal structure

Cox Group is a vertically integrated global water and energy utility, applying innovative technology solutions for sustainability that contribute to social wellbeing.

Cox Group headquarters are in Spain, and, by the end of 2023, its staff comprised over 6,200 employees worldwide.

Cox Group activity is organized based on business areas and geographic regions. The company is specialized in the development of turnkey projects for third parties in four key areas: energy, water, transmission and infrastructure and services, and it has capabilities which cover engineering, procurement, construction and start up.

During 2023, the company has mainly developed its activity in five strategic geographical areas. These are South America (Argentina, Brazil and Chile), North America (United States and Mexico), Europe (Spain, France and United Kingdom), Africa (Morocco and South Africa) and the Middle East (Saudi Arabia, United Arab Emirates).



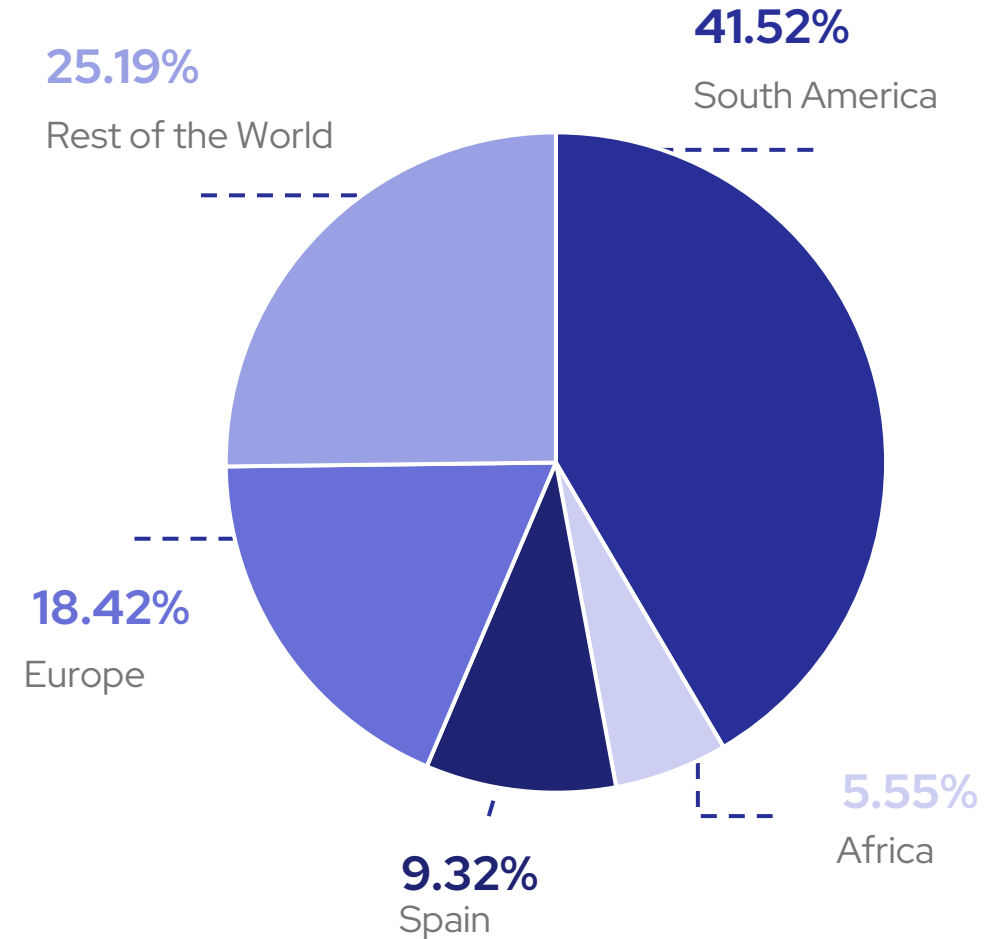
## Supply chain and business operating model

Throughout 2023, Cox Group has worked with **3,825 suppliers in 41 countries**, out of which **1,202 suppliers** started working for the company this year.

The countries with the highest number of suppliers are Spain, Brazil, Chile, Argentina, Mexico and France, with an accumulated total of 82,67% of the total. The volume of purchases for these countries represents 74,3% of the total.

Two main types of suppliers are identified: those that provide service to the main activities of the company such as engineering, construction and operation and maintenance and, the suppliers that support the internal infrastructure necessary to operate.

Among the main types of supplies, capital goods with a wide spectrum of technological development, raw materials and components, as well as professional engineering, construction and installation, advisory, consulting and transportation services stand out.



## Supply chain and business operating model

Procurement is undertaken by professional purchasing specialists from the centralized purchasing area and the business units, and they **ensure that suppliers always adhere to our ethical, labour, environmental and health and safety standards, including the avoidance of slavery and human trafficking.**

Cox Group has a standardized approval process for all Cox Group suppliers, including sustainability criteria and considering the geographical diversity and activities of its operations.

This process allows a more comprehensive diagnosis of the supply chain, with a better identification and assessment of supplier related risks.





## Protection of human rights in the supply chain

Cox Group considers that the respect for human rights is a basic principle for the achievement of sustainable growth, both inside and out of the organization, as well as throughout its entire value chain and in its areas of influence. To achieve this, the company integrates the principles of the UN Universal Declaration of Human Rights, the SA 8000 standard, the principles of the Global Compact and the OECDs guidelines in all its initiatives, regardless of the regions in which it operates.

Likewise, the company is still committed to observing the principles and fundamental rights of all workers as part of its commitment to the Declaration of the International Labour Organization (ILO), to respect and promote workers' principles and rights, the right to freedom of association and freedom to become a member of trade unions and works councils, and the effective recognition of the right to participate in collective bargaining agreements, elimination of forced or mandatory labour, abolishment of child labour and the elimination of discrimination in relation to employment and occupation.

The geographical dispersion of the company's activities and businesses increase the requirements that must be met to prevent and control potential violations of human rights. To achieve this, Cox Group has its own **Common Management Systems**, internal regulations ultimately approved by the company's chairman, of mandatory application for all its businesses.

To achieve the rigorousness degree which is required in its commitment of protection, prevention and control of possible violations of human rights, Cox Group has implemented the following mechanisms:

# Protection of human rights in the supply chain

- **Code of Conduct**

Includes the guidelines and measures aimed at preventing incidents associated with the violation of human rights or any other value of the organization, in addition to ensuring the strictest honesty and ethical conduct standards are observed, including procedures to handle professional and personal conflicts of interest.
- **Risk Management Systems**

Prevents and Manages the risks associated with violating human rights throughout its value chain.
- **Sustainability Code**

Adherence to the CSR Code for suppliers and subcontractors, which includes clauses on protection of human rights based on international standards. the supplier not only commits to comply with these principles in its activities, but also to openly accept any audit or inspection conducted by Cox Group to ensure the code is being observed.
- **Supplier audits and non-financial internal audits**

Verify the level of compliance of adherence to the CSR Code. Audits of non-financial information indicators.
- **Good Practices Commission**

Assesses the cases in which Cox Group's code of conduct is not observed, as well as any form of internal fraud. the committee is chaired by the internal Audit department and is made up of the corporate Human Resources, Legal and Regulatory Compliance departments.
- **Common Management Systems**

Establish Mandatory standards for all employees, who must comply in 100% of the business, regardless of the place in which they develop their activities.
- **Whistleblowing Channel**

Reliable and safe dialogue mechanism for which any stakeholder can confidentially and anonymously report any form of irregular activity detected during the development of their professional functions. there is a channel for internal and external complaints, according to the specific requirements of the Sarbanes - Oxley Act.
- **Follow-up and improvement**

Monitor the company's performance, with weekly reports of each area, as well as monthly committees held with the chairman's office.

# 3 > Internal Policies

**Cox Group is committed to combatting slavery and human trafficking and takes responsibility for ensuring that its working practices comply with the Modern Slavery Act 2015.**

This statement reflects this commitment to acting ethically and with integrity in every business relationship and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within the company or its supply chain.

Cox Group builds its strategy based on regulatory compliance and good corporate governance, as established in its code of conduct and it operates under some policies and statements which ensure that business is conducted to the highest ethical standards.

Its business model and corporate culture are governed by solid values, such as integrity, reliability, professional rigor, customer focus, social contribution, diversity, equal opportunities and health and safety, among others.

Cox Group operates under several statements and **policies which ensure business is conducted to the highest ethical standards:**

- Code of conduct
- Criminal compliance program
- Corporate Sustainability Policy
- Diversity Policy
- Occupational Social Responsibility (OSR) and Hiring policies
- Occupational Health and Safety policy
- Sustainability Code for suppliers

## Code of Conduct

Cox Group created a professional **Code of conduct** that establishes **the ethical behaviour guidelines which must govern the company's activity and the prohibitions based on the values that define the organization's corporate philosophy**. Likewise, it defines the working relationship of its employees, executives and directors in the company, as well as the relations with its stakeholders. In this way, Cox Group suppliers must consider the code of conduct, which is included in the procurement documentation.

This code includes guidelines and measures to prevent incidents related to human rights violation, together with the requirement of the highest standards of honesty and ethical conduct.

Cox Group code of conduct:

- Requires the highest honesty and ethical conduct standards.
- Requires compliance with the applicable laws, standards and regulations.
- Addresses real or possible conflicts of interest and provides to report such conflicts to Cox Group .
- Guarantees that all communications with the Public Administration or external entities meet the applicable requirements.
- Guarantees that failure to observe the code is immediately reported, as well as any signs of illegal conduct. It is vital for the organization's employees to be acquainted with the code of conduct to ensure the practical application of its principles.

## Code of Conduct

According to the Code of conduct's content, the four fundamental principles inherent to workers' rights are:

- **Workplace discrimination:** the elimination of discrimination in issues of employment and occupation. Human rights are more extensive than the mere rights of employees in the workplace. The anti discriminatory policies are key requirements of the agreements and of the international social laws and regulations. The issue of discrimination is also addressed in the Fundamental Conventions 100 and 101 of the ILO. It is necessary to have an effective control system to ensure compliance in all operations of the reporting organization. Stakeholders strive to ensure that such policies and the control of these are efficient.
- **Freedom of Association and collective bargaining:** freedom of association and freedom to join a union and work councils. Freedom of association is a human right, as defined in international declarations, especially in the Framework Conventions 87 and 98 of the ILO. Collective bargaining is an important form of engagement with stakeholders and is particularly relevant for the guidelines in writing reports. This undertaking helps to build institutional structures, and many believe that it helps towards a stable society. Together with corporate governance, collective bargaining forms part of the general framework that helps towards responsible management. It is an instrument used by the parties to facilitate collaborative efforts to enhance the positive social impact of an organization.

## Code of Conduct

- ***The elimination of forced or obligatory labour:*** it is considered a fundamental human right not to be subject to forced or unconsented labour, as stipulated in the United Nations Universal Declaration of Human Rights and regulated in the Fundamental Conventions 29 and 105 of the ILO. This type of work can take many forms and the data provided will indicate the challenges of the reporting organization to help abolish forced or unconsented labour.
- ***The effective elimination of child labour:*** the abolition of child labour is a key principle and one of the goals of legislation and of the main declarations on human rights and is covered by Conventions 138 and 182 of the ILO. The existence and effective implementation of policies on child labour represent basic expectations of socially responsible conduct.

*This code is available on Cox Group intranet and website in the two functional languages of the organisation - Spanish and English - and can be accessed by every stakeholder.*

## Criminal Compliance Program

At Cox Group , all employee actions should be governed by **rigour, order and responsibility**. Under this internal standard, both the company and the natural person may be liable for crimes that are perpetrated.

The following conducts are forbidden for all employees in performing their professional duties, in accordance with Cox Group [Criminal Compliance Program](#) and [Criminal Prevention Compliance Policy](#) (PPP):

- **Any type of action** that directly or indirectly **threatens or restricts the freedom of movement of people in any way**, especially human trafficking.
- **Any type of action** that directly or indirectly **threatens, imposes, incites, forces or restricts sexual freedom in any way**, especially prostitution and the corruption of minors.
- **Any action** that promotes or contributes to **the illegal transplanting and trafficking of human organs**.
- **Any action** that supports or promotes **the illegal trafficking or illegal immigration of people**.

All the information is available on Cox Group [Compliance website](#).



## Sustainability Policy

Cox Group **Corporate Sustainability Policy** establishes the main guidelines of the social, financial and environmental areas which must be followed by the whole organization, ensuring sustainability is integrated across all business areas, acting as a lever to ensure it achieves its business goals. With this policy, Cox Group guarantees full integration of sustainability in the entire organization and the availability of supervision mechanisms allowing the company to detect non-compliant behavior.

Moreover, considering that companies play a fundamental role in fostering a responsible business fabric, Cox Group makes sustainability policy and commitments **extensive to its supply chain** irrespective of the industry or geographical areas where these are located. With this policy, Cox Group has established, among others, the following action lines:

- **Guaranteeing the health and safety** of own employees and contractors at all the facilities of Cox Group through awareness raising actions and a culture of prevention.
- **Assuring the protection of Human Rights** in connection with all activities conducted by the company and by its supply chain.
- **Fostering gender diversity and equal opportunities and treatment** for men and women in the organization, stimulating measures that guarantee non-discrimination whatsoever and the promotion of under-represented groups at the workplace, giving them more visibility.
- **Ensuring that Cox Group professionals are skilled** enough to achieve the goals of its Strategic Plan.

## Sustainability Policy

- **Committing to social development of the communities** in which the company operates via collaboration projects with NGOs and local institutions. Investing in education to benefit the integration of the most vulnerable collectives and offering them the tools and resources needed for their economic, cultural and social development.
- **Cultivating corporate volunteering actions** among employees at Cox Group and their families to make them part of the commitment of the organization to social development while at the same time bolstering projects with their contributions.
- **Advancing a culture of sustainability within the organization**, favoring communication and training in matters relating to any of the topics contained in this policy.
- Advancing **the use of reporting channels** (internal and external) among employees and the remaining stakeholders as the suitable tools to report any activities, practices or behavior contrary to the values of the organization, the code of conduct, to this policy or to any of the internal rules of Cox Group (NOC) to the most senior members of the organization.
- Strengthening and verifying the mechanisms set out to **combat corruption and foster a culture of ethics and integrity** among employees in completing their activities.

## Diversity Policy

Cox Group **Diversity Policy** was established as an exponent of the company's commitment towards diversity, which emanates from placing people at the core and from the certainty that, simply on account of being people, they deserve **maximum consideration and dignity regardless of their race, gender, religious beliefs, nationality, cultural background, age, sexual orientation and/or different physical or mental abilities**. For said reason, Cox Group is committed to following:

- To promote diversity through education and information, for the purposes of raising awareness among the persons that comprise Cox Group
- To follow a business management approach that inspires and respects the principles of Diversity, promoting the true integration of all the people, rejecting preconceptions and avoiding all kinds of discrimination or disparate or disrespectful treatment.
- To conduct active monitoring actions to achieve the effective application of this Policy.
- To promote the use, with all guarantees, of the already existing channels to report any action that goes against the Diversity Policy based on discrimination situations or situation of disparate or disrespectful treatment due to gender, religious beliefs, race, cultural background, nationality, sexual orientation, age or different abilities.
- To project, in internal and external presentations and communications, an exclusive image that portrays the value of Diversity always.
- To extend this Policy to all collaborators who, although they are not part of the company directly, contribute with their products and services to the Cox Group project.

## Hiring Policy

The supplier Hiring Policy is governed by the principles of transparency, rigor and professionalism of all the staff. The most relevant procedures within the purchase management are detailed below:



## Occupational Health and Safety policy

All employees have a basic labour right to being informed about any organizational change through their supervisors or representatives before such change occurs, as established by law and according to the specific collective bargaining agreements.

In accordance with the social responsibility commitments acquired after adhering to the UN Global Compact and established in its Code of Conduct, Cox Group uses its own Occupational Social Responsibility policy (OSR) to guarantee the commitment to the above, establishing a social responsibility management system in accordance with the international model SA8000.

## Occupational Health and Safety policy

Cox Group has **a firm commitment to prevent accidents and to improve the health and safety conditions in every activity**, both in its own facilities and in the areas in which its subcontracted activities are carried out.

For this reason, the company implements effective health and safety management systems, which are audited at regular intervals by certified entities to guarantee that they have been implemented correctly, according to the reference regulations. These management systems are based on five pillars, which are used to define the company's Health and Safety Policy:



- Integration of Health and Safety across all levels of the organization as its corporate strategy.
- Leadership driven from management in relation to Health and Safety, with the aim of having a proactive impact on increasing the culture of prevention across the organization.
- Firm commitment to on going training on Health and Safety, as a basic pillar to have an impact on the change in the behavior of its employees and, as a result, as an element that drives the culture of prevention across the organization
- Implementation of a Health and Safety management system that focuses on the continuous improvement of its production processes with the regular assessment and review of all activities inherent to the system.
- Ensuring strict compliance of all activities always carried out within the organization with the Occupational Health and Safety regulations.

# Sustainability Code for Suppliers

Cox Group focuses on establishing, fostering and ensuring high levels of social responsibility in its lines of activity, promoting compliance with ethical, labour, environmental and health and safety standards with its suppliers.

For this reason, **suppliers must sign the Sustainability Code of Cox Group** for suppliers and subcontractors, which is essential for any supplier to be authorized to work for the company.

Through this demand, Cox Group ensures that suppliers comply with the following criteria:

<p> <b>Ethics and integrity</b></p> <ul style="list-style-type: none"> <li>Operate in an ethical manner</li> <li>Compliance with laws and regulations</li> <li>Practices that generate negative impacts</li> <li>Prevention and fight against any form of corruption</li> <li>Fair competition</li> <li>Confidential information</li> <li>Intellectual property rights</li> <li>Countries not included in the list of sponsors of terrorism</li> <li>Conformity with US Foreign Corrupt Practice Act</li> </ul>	<p> <b>Labour practices</b></p> <ul style="list-style-type: none"> <li>Respect the fundamental rights of the International Labour Organization (ILO's Conventions and Recommendations)</li> <li>Prohibition of child labour</li> <li>Prohibition of forced labour</li> <li>Compliance of wages and working hours</li> <li>Rights of freedom of association, affiliation and collective bargaining</li> <li>Equal opportunities and non-discrimination</li> </ul>	<p> <b>Environment</b></p> <ul style="list-style-type: none"> <li>Respect for the environment</li> <li>Compliance with the applicable legislation and regulations in this matter</li> <li>Preventive approach that protects the environment</li> <li>Ensure the minimisation of environmental impact</li> <li>Promoting actions for improvement and efficiency in relation to emissions, water consumption, waste generation and management, energy consumption, use of raw materials and other resources</li> </ul>
<p> <b>Human rights</b></p> <ul style="list-style-type: none"> <li>Respect for human rights and avoid any infringements in this regard</li> <li>Avoid harassment and abuse</li> </ul>	<p> <b>Health and safety</b></p> <ul style="list-style-type: none"> <li>Safe and healthy work environment</li> <li>Ensure workers' protection, assessing activity risks</li> <li>Prevent injuries and accidents</li> <li>Proper and sufficient training in health and safety</li> <li>Compliance of quality and safety criteria</li> <li>Due diligence required by law on the source and custody of conflict materials</li> </ul>	

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# Due Diligence and Risk Management

## Policies and processes review

Cox Group **updates its policies and the Common Management Systems on a regular basis.**

In addition, the company continuously improves its working processes, including the ones related to procurement.

It is essential to become more effective and efficient to improve the company's competitiveness, consolidate the effectiveness of recovery processes and achieve the growth objective.

With this goal in mind, the company has rolled out an action plan to **reinforce the focus on processes**, which involves the definition and continual improvement of Cox Group 's process map.



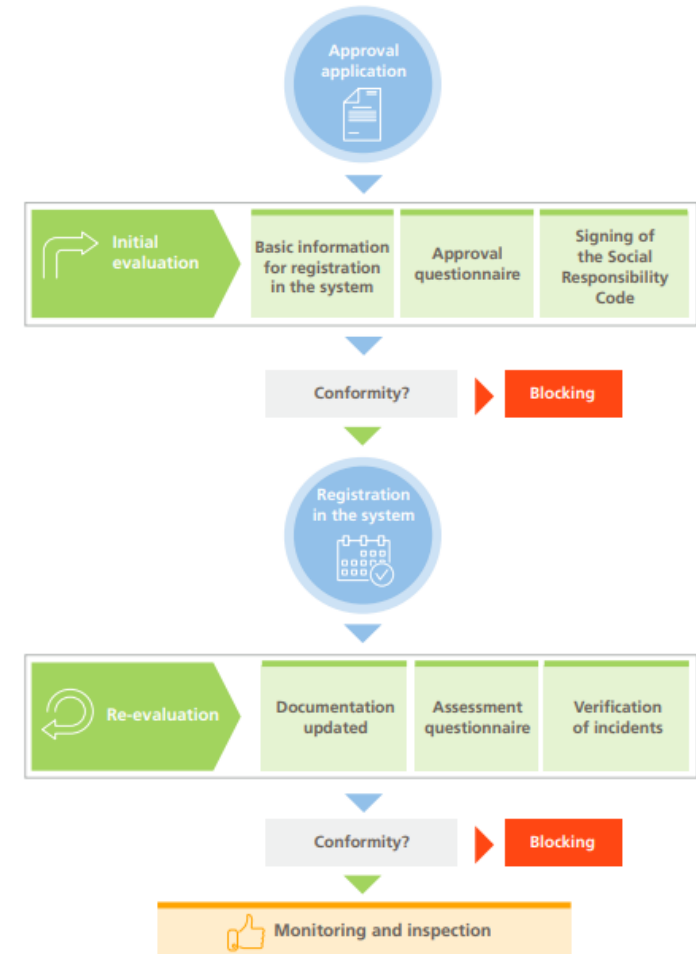
# Suppliers' adherence to the Sustainability Code

Cox Group **requires its suppliers to adhere to the Sustainability Code for suppliers and subcontractors**, which was updated in 2016, strengthening the corporate integrity, transparency and governance areas.

The signing of the Sustainability Code **is required** during the supplier homologation process.

Adhering to this code is not only a way of ensuring business is done as expected, but also a means of improving the quality of life and professional conditions of all actors across the supply chain, contributing to a more sustainable world.

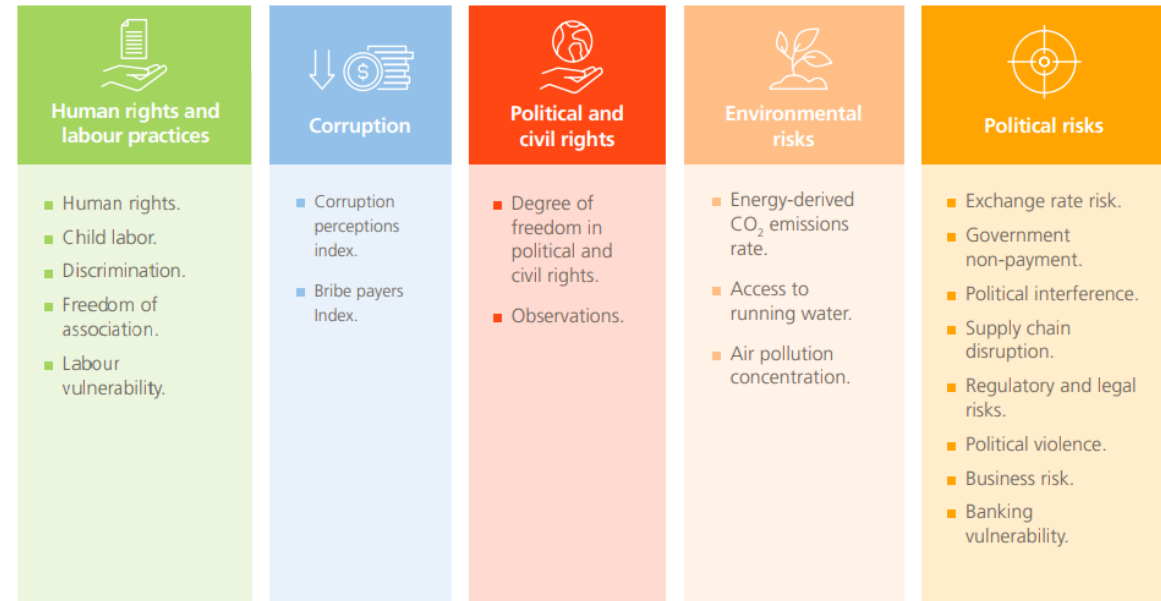
**All new suppliers are required to confirm their compliance with these principles before commencing the supply of goods or services.** By signing this agreement, the supplier not only commits to comply with these principles in its activities, but also to openly accept any audit or inspection conducted by Cox Group to ensure the code is being observed.



## Risk management in the supply chain

Cox Group carries out a **risk assessment on the supply chain**, with the purpose of **determining the involvement and acceptance of the corporate policies by suppliers**, determining the level of risk and establishing measures to mitigate it.

Suppliers are assessed by conducting an analysis that considers a series of risk factors. International indices are used to determine the risk level, which include different aspects, such as human rights, labour practices, corruption, political and civil rights, and political and environmental risks, among others.



## Risk management in the supply chain

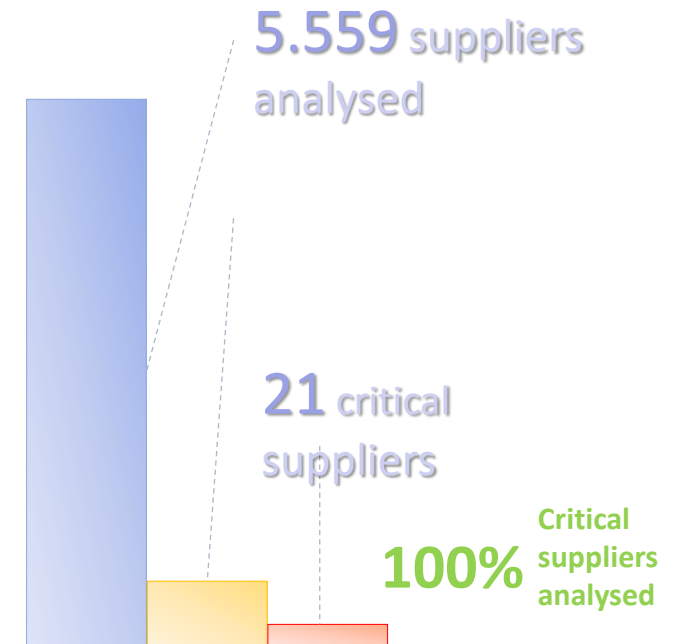
Once the risk level has been analyzed and its criticality has been evaluated, suppliers are assessed with the purpose of determining to what extent they comply with the principles defined in the Sustainability Code.

An audit procedure was created to conduct these assessments, which defines the aspects to review and establishes the scope of the work. This assessment is carried out on a yearly basis.

In reference to the last assessment, 5,559 suppliers were analyzed. 58 of them were identified as high-risk suppliers and 21 of them were considered as critical. Due to the exceptional situation of bankruptcy, during 2022 no supplier audits have been carried out, although this process will be resumed in 2023, including suppliers considered critical this year.

Cox Group considers the possibility of ceasing to work with suppliers that breach internal requirements if they are not rectified. In 2023, the company did not stop working with any critical supplier for these reasons.

As part of this process, Cox Group adopts an effective system to ensure that any deal with any business or individual knowingly involved in slavery and human trafficking is not allowed.



## Minerals in Conflict

Cox Group forbids any commercial product from containing a “conflict mineral”. To make sure of it, the company has voluntarily adopted a self-regulatory plan called [Prevention of Minerals in Conflict Program](#), which has the purpose of controlling their origin and application in Cox Group facilities, as well as to explain the obligations to which all companies are subject through Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

This **Act prohibits any commercialized product from containing a conflict mineral, which are minerals and metals mined in the Democratic Republic of the Congo or bordering countries.** If they have this origin, or the source cannot be established, to market these products in compliance with prevailing legislation, **the source and chain of custody must be subject to due diligence, to guarantee that the purchase or sale of said minerals did not benefit any armed group.**

The Prevention of Minerals in Conflict Program applies to every Cox Group business with manufacturing capacity that incorporate these minerals into their chain, either directly or indirectly into products that are subsequently distributed to third parties.



# 5 > Good Practices Committee

**Purpose:** to assess the breaches of Cox Group 's Code of Conduct and / or potential cases of internal fraud (understood as a breach of mandatory policies and processes by a Manager), in which these have been an instrumental process for the commission or attempted commission of a crime or administrative offense, within the scope of its functions.

One session of this body has been held in 2023.

The committee **is chaired by the Internal Audit** department and is made up of the corporate departments of **Human Resources, Legal and Compliance**.

The Good Practices Committee shall **activate the contingency plan in the event of any indication of non-compliance** of this statement or any aspect related to human rights that is received through any of the channels and procedures established by the company. The phases of the contingency plan are as follows:

1. Appointment of the instructor.
2. Interviews and documentary analysis.
3. Report making.
4. Completion of the form established for this purpose.
5. Closure of the file.
6. Result of the instruction and actions.
7. Tracing.

# 6 > Governance, Training and Reporting

## Governance

The Sustainability area reports directly to the Chairman's office and holds regular meetings to monitor all matters relating to sustainability. Furthermore, the Audit Committee is responsible for ensuring that all subsidiary companies observe the Code of Ethics in their operations and reviewing compliance with the strategic lines set forth in the CSR policy.

## Recruitment and training

Cox Group's occupational responsibility policy, which is the basis of its social accountability management system in accordance with the international model SA8000, ensures compliance with all the relevant employment legislation, confirming the entitlement to work in every country where the company operates.

The internal manual for new hires includes all the documentation regarding ethical behavior principles and measures, among which is the code of conduct, which constitutes the guideline to prevent incidents related to human rights violation, together with the requirement of the highest standards of honesty and ethical conduct.

Regardless, all the staff is aware of this code and every organizational policy mentioned before and they are permanently available both in the company's Common Management Systems and its external website ([www.Cox Group .com](http://www.CoxGroup.com)).

These measures ensure that slavery and human trafficking are not taking place within the organization or its supply chain.



## Key performance indicators

Cox Group 's main key performance indicator is the number of irregularities identified. The company's main tool to detect any incident, breach or unethical, unlawful or any other form of behaviour that fails to observe the internal norms is the whistleblowing channel.

Every complaint is received directly by the Corporate Compliance Officer and the Internal Audit Manager. Once analysed, all complaints are reported to the Audit Committee and the chairman of the Board of Directors, who will formally conclude on the investigations or determine the measures that must be adopted.

During 2023, no incidents on modern slavery were identified.



*Cox Group was awarded in 2019 with the silver medal of Ecovadis, as a symbol of recognition for its good practices in governance, ethical, labour and environmental matters.*

# 7 > Leadership

Cox Group 's Slavery and Human Trafficking statement was signed by the Executive Chairman of the company, in May of 2024.

**Enrique Riquelme Vives**

*Executive Chairman of Cox Group*



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