

**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 for financial year 2021**

*This statement is made pursuant to s.54 of the Modern Slavery Act 2015 for the financial year ending 31/12/2021 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 labor. 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, Macquarie, Aberdeen 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.

We work with partners at national, regional and local levels where: (i) Employers are able to recruit the right people with the right skills at the right time. (ii) Employers have high performing, highly productive, fair and equal workplaces. (iii) People have the right skills and confidence to secure good work and progress in their careers. (iv) There is greater equality of opportunity for all.

### 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. Ensuring forced, bonded or compulsory labor practices are not used, and employees are free to leave their employment after reasonable notice. Employees must not be required to lodge deposits of money or identity papers with their employer.
2. Anti-slavery policy. This policy sets out the organization's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
3. Recruitment policy. We operate a robust recruitment policy checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
4. 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.
5. Code of business conduct. This code explains the manner in which we behave as an organization and how we expect our employees and suppliers to act.

### Our suppliers, Procurement Activity and Due Diligence

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 organization 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.

The risk of Modern Slavery in ZBL's activities is considered low. However, we recognize the potential risks linked to the extended and indirect supply chain of goods and services. For ZBL, such risks are reduced as procurement of goods and services according to the internal regulations.

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 will not to renew the contract if it becomes apparent that the 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 Effectiveness in Combating Slavery and Human Trafficking

We use the following to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains: (i) Effective use the HR Resourcing Policy (ii) Completion of audits conducted by internal and external audit (iii) Level of communication and personal contact with 1st tier supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Slavery and human trafficking statement for the financial year ending 31 December 2021.

### Approval for this statement

This statement was approved by the Board of Directors on September 28th, 2021

Name: Jaime P. Lamela Pascua, head of branch - upon Power of Attorney

Signature:

A handwritten signature in blue ink, appearing to be 'JPL' with a stylized flourish.

Name: Jaime P. Lamela Pascua, head of branch - upon Power of Attorney

**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 2021**

*This statement is made pursuant to s.54 of the Modern Slavery Act 2015 for the financial year ending 31/12/2021 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:

1. Anti-slavery policy. This policy sets out the organization's stance on modern slavery and explains how to identify any instances of this.
2. Code of business conduct. This code explains the manner in which we behave as an organisation.

### 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:

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

#### 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.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Slavery and human trafficking statement for the financial year ending 31 December 2021.

#### Approval for this statement

This statement was approved by the Board of Directors on September 28th, 2021

Name: Jaime P. Lamela Pascua, head of branch - upon Power of Attorney

Signature:

A handwritten signature in blue ink, consisting of a long, sweeping horizontal line followed by a stylized, looped flourish.

Name: Jaime P. Lamela Pascua, head of branch - upon Power of Attorney