

Zero Bypass Limited,

a company with its registered office at

C/O CMS Cameron McKenna Nabarro Olswang 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 Vlčie hrdlo 72B, 821 07 Bratislava – mestská časť Ružinov, Slovak Republic, Identification No.: 50 110 276, registered with the Business Register of the City Court Bratislava III, Section Po, File No.: 3188/B

Modern Slavery Statement for financial year 2025

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 for the financial year ending 31 December 2025 and sets out the steps that Zero Bypass Limited has taken during that financial year, and continues to take, to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced or compulsory labour. Zero Bypass Limited has a zero-tolerance approach to any form of modern slavery. The Company is committed to acting ethically, 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 its business or supply chain.

Our business

Zero Bypass Limited is a company incorporated under the laws of England and Wales. According to the Concession Agreement concluded with the Slovak Republic, represented by the Ministry of Transport of the Slovak Republic, the Company is responsible for the 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.

The Company carries out the active operational, maintenance, administrative and project-related activities of the D4/R7 PPP Project, including through its Slovak organisational unit, Zero Bypass Limited, organizačná zložka. The Company works with contractors, subcontractors, suppliers, service providers and professional advisers in connection with the operation, maintenance, administration and financing of the D4/R7 PPP Project. Its supply chain is mainly linked to infrastructure operation and maintenance, technical services, professional services, facilities, materials, equipment and administrative support.

Risk assessment and management

The Company considers the risk of modern slavery in its direct business to be low, given the nature of its activities, the limited number of direct employees and the regulated environment in which the D4/R7 PPP Project operates.

However, the Company recognises that potential risks may arise in extended and indirect supply chains, particularly where goods, materials, labour or services are provided through subcontracting chains or third-party manufacturers. The Company aims to reduce such risks by limiting its suppliers and subcontractors where possible, ensuring that relevant suppliers and subcontractors can be vetted on an individual basis, and by maintaining appropriate procurement controls and ongoing monitoring.

Our policies

The Company operates a number of internal policies and procedures to ensure that it conducts business in an ethical and transparent manner. These include:

1. Ensuring that forced, bonded or compulsory labour practices are not used, and that employees are free to leave their employment after reasonable notice. Employees must not be required to lodge deposits of money or identity documents with their employer.
2. Anti-slavery policy. This policy sets out the Company'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. The Company operates robust recruitment checks for employees to safeguard against human trafficking or individuals being forced to work against their will.
4. Whistleblowing policy. The Company operates a whistleblowing policy so that employees know that they can raise concerns about how colleagues are being treated, or about practices within the Company's business or supply chain, without fear of reprisals.
5. Code of business conduct. This code explains the manner in which the Company behaves as an organisation and how it expects its 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. The Company conducts due diligence on suppliers before allowing them to become preferred suppliers. This due diligence may include an online search to confirm that the relevant organisation has not been convicted of offences relating to modern slavery.

The Company's anti-slavery policy forms part of its contractual approach with suppliers, and suppliers are required, where applicable, 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, the Company recognises the potential risks linked to extended and indirect supply chains of goods and services. For ZBL, such risks are reduced by procuring goods and services in accordance with internal regulations and procurement procedures.

In addition to the above, as part of its contractual arrangements with suppliers, the Company may require suppliers to confirm that:

1. they have taken steps to eradicate modern slavery within their business;
2. they hold their own suppliers to account in relation to modern slavery;
3. for UK-based suppliers, they pay their employees at least the national minimum wage or national living wage, as applicable;
4. for international suppliers, they pay their employees any prevailing minimum wage applicable within their country of operations; and
5. the Company may refuse to renew, suspend or terminate the contract if it becomes apparent that any instance of modern slavery or human trafficking has occurred or has not been appropriately addressed.

Training

The Company provides awareness and, where appropriate, training for its procurement and buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within the Company's supply chain.

Our effectiveness in combating slavery and human trafficking

The Company uses the following measures to assess the effectiveness of its approach to ensuring that slavery and human trafficking are not taking place in any part of its business or supply chains:

1. effective use of the HR Resourcing Policy;
2. completion of audits conducted by internal and external audit, where applicable;

3. level of communication and personal contact with first-tier suppliers and their understanding of, and compliance with, the Company's expectations; and
4. review of any concerns, complaints or incidents reported during the financial year.

For the financial year ending 31 December 2025, the Company has not identified any confirmed case of modern slavery or human trafficking within its own business or supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending 31 December 2025.

Approval for this statement

This statement was approved by the Board of Directors on 9 July 2026.

Signature:

Name:  Tomáš Bežilla, Head of Branch, acting under Power of Attorney

Zero Bypass (Holdings) Limited,

a company with its registered office at

C/O CMS Cameron McKenna Nabarro Olswang LLP, Cannon Place,

78 Cannon Street, London, EC4N 6AF, United Kingdom,

registered at Companies House under number 10196807,

Modern Slavery Statement for financial year 2025

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 for the financial year ending 31 December 2025 and sets out the steps that Zero Bypass (Holdings) Limited has taken during that financial year, and continues to take, to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced or compulsory labour. Zero Bypass (Holdings) Limited has a zero-tolerance approach to any form of modern slavery. The Company is committed to acting ethically, 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 its business or supply chain.

Our business

Zero Bypass (Holdings) Limited is a company incorporated under the laws of England and Wales and is the parent company and sole shareholder of Zero Bypass Limited.

Zero Bypass (Holdings) Limited acts as a holding and parent company and has limited direct operational activities of its own. Save for its corporate holding, governance and administrative functions, the Company's activities in relation to the D4/R7 PPP Project are carried out through Zero Bypass Limited, including through Zero Bypass Limited's Slovak organisational unit. Zero Bypass Limited is the active operating company responsible for the design, construction, financing, operation and maintenance of the D4/R7 PPP Project in Slovakia, comprising sections of the D4 motorway and R7 expressway forming part of the southern part of the Bratislava bypass.

The Company's direct supply chain is therefore limited and mainly consists of professional advisers, corporate service providers and administrative support service providers.

Our policies

The Company operates, and relies on the group's wider compliance framework where appropriate, a number of internal policies and procedures to ensure that business is conducted in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the Company'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 the Company behaves as an organisation and how it expects its service providers and business partners to act.

Our suppliers

Zero Bypass (Holdings) Limited operates a supplier policy and maintains a preferred supplier list. The Company conducts due diligence on suppliers before allowing them to become preferred suppliers. This due diligence may include an online search to confirm that the relevant organisation has not been convicted of offences relating to modern slavery.

The Company's anti-slavery policy forms part of its contractual approach with suppliers, and suppliers are required, where applicable, to confirm that no part of their business operations contradicts this policy.

Due to the limited nature of its activities as a holding and parent company, Zero Bypass (Holdings) Limited has a relatively simple and low-risk direct supply chain. The Company nevertheless recognises that modern slavery risks may arise in wider and indirect supply chains, particularly in the supply chains of operating companies. For this reason, the Company expects Zero Bypass Limited, its suppliers, service providers and business partners to comply with applicable law and to operate in a manner consistent with the Company's zero-tolerance approach to modern slavery and human trafficking.

In addition to the above, as part of its contractual arrangements with suppliers, the Company may require suppliers to confirm that:

1. they have taken steps to eradicate modern slavery within their business;
2. they hold their own suppliers to account in relation to modern slavery;
3. for UK-based suppliers, they pay their employees at least the national minimum wage or national living wage, as applicable; and
4. for international suppliers, they pay their employees any prevailing minimum wage applicable within their country of operations.

Risk assessment and management

The Company considers the risk of modern slavery in its own direct business and direct supply chain to be low, given that it acts primarily as a holding and parent company with limited direct operational activities.

The principal modern slavery risk exposure of the group is linked to the wider and indirect supply chains connected with the active operating activities of Zero Bypass Limited and the D4/R7 PPP Project. The Company therefore manages this risk by ensuring that Zero Bypass Limited maintains appropriate procurement controls, supplier due diligence, contractual expectations and reporting mechanisms proportionate to the nature of its business and supply chain.

Our performance indicators

The Company assesses the effectiveness of the steps it takes to ensure that slavery and human trafficking are not taking place within its business or supply chain by reviewing whether any reports have been received from employees, suppliers, service providers, the public or law enforcement agencies indicating that modern slavery practices have been identified.

The Company also takes into account the controls and reporting mechanisms applied by Zero Bypass Limited as the active operating company through which the parent company's project-related activities are carried out.

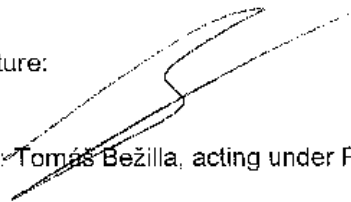
For the financial year ending 31 December 2025, the Company has not identified any confirmed case of modern slavery or human trafficking within its own business or supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending 31 December 2025.

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