



ELITE CONSTRUCCIONES S.L.

PUNTA EUROPA, MALABO, GUINEA ECUATORIAL

TEL. NO: (+240) 555 696 400

TEL. NO: (+44) 3300 431 528

EMAIL: elite@eliteconstruccion.com

WEB: www.elite-equatorialguinea.com

ANTI SLAVERY AND HUMAN TRAFFICKING POLICY

PURPOSE

Elite is a company committed to a work environment free from human trafficking and slavery. We adopt a zero- tolerance approach to the fundamental violation of an individual's basic human rights that modern slavery and human trafficking represents.

Universal Declaration of Human Rights in 1948 Article 4.

We are dedicated to acting ethically and with integrity in all our business relations and to implementing and enforcing effective systems to prevent slavery and human trafficking. We will not knowingly do any business with companies that employ or utilize slavery or servitude, forced or compulsory labour, child labour or are complicit in human trafficking activities.

Further as required by law, Elite's employees, contractors, subcontractors, agents and suppliers shall not:

1. Engage in any form of trafficking in persons during the performance contract.
2. Use forced labour in the performance of any work related to the contract.
3. Destroy, conceal, confiscate or otherwise deny access by an employee to the employee's identity or immigration documents such as passports.
4. Use recruiters that do not comply to labour laws of the country in which recruiting takes place.
5. Use misleading or fraudulent practices during the recruitment of employees or offering employment, such as failing to disclose, in format and language accessible to the worker, basic information such as wages, living conditions, location of work, deductions and the hazardous nature of work (if any).

Each employee, contractor, subcontractor, supplier and agent is responsible for ensuring compliance with this policy. Any violation of this policy could result in disciplinary action, up to and including removal from contract, termination of a business relation subject to the applicable law.



ELITE CONSTRUCCIONES S.L.

PUNTA EUROPA, MALABO, GUINEA ECUATORIAL

TEL. NO: (+240) 555 696 400

TEL. NO: (+44) 3300 431 528

EMAIL: elite@eliteconstruccion.com

WEB: www.elite-equatorialguinea.com

INVESTIGATIONS AND REPORTING

Elite will perform investigations and audits to verify that business is conducted in compliance with this policy. All Elite's employees and third parties who conduct business through Elite will fully and truthfully respond to any investigations and audits carried out, any failure to fully cooperate or hinder the investigation or audit may lead to disciplinary action, up to and including termination subject to applicable laws.

Creditable information regarding potential violation of this policy, whether by employee, contractor, subcontractor, supplier or agent will be investigated fully and applicable laws enforced on findings (if required).

HUMAN RESOURCES GUIDANCE

In general, and taking into account Elite's policy outlined above, we consider that our permanent workforce is unlikely to be, or to become, victims of modern day slavery and human trafficking, but we are none the less alert to the possibility.

We are cognizant of the fact that victims of modern day slavery and human trafficking are likely to be living in circumstances of fear and therefore may not actively seek help. Elite's HR professionals are advised to be aware and alert of red flag behavioral warnings known to be exhibited by a victim.

NO MODERN SLAVERY OR HUMAN TRAFFICKING MATTERS HAVE EVER BEEN RAISED BY ELITE SINCE START OF BUSINESS 2012.

Antonio Nsue Avoro
Company Lawyer and Compliance Officer
Mobile: +240 555 274 082
Email: nsueavoroantonio@eliteconstruccion.com
Email: eliteintegrit@eliteconstruccion.com