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MODEC HUMAN RIGHTS POLICY

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MODEC GROUP POLICY





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INTRODUCTION

POLICY STATEMENT

MODEC, Inc. ("Company") and its subsidiaries ("MODEC" or the "MODEC Group") value international human rights standards throughout the world. As we fulfil our obligations to the MODEC Group stakeholders, including customers, Business Partners, local communities where we conduct business and our employees, shareholders, suppliers and subcontractors, MODEC is dedicated to promoting respect for and among all people, safeguarding human rights in the local communities where we conduct business, adhering to established labor and workplace practices and acting responsibly toward the environments in which operate.

MODEC is committed to act in a manner that demonstrates respect for fundamental human rights throughout the chain of our business operations.

As applicable to our global business, MODEC respects internationally recognised human rights principles as established in the United Nations Universal Declaration of Human Rights, and accompanying Covenants, the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, and all other applicable international human rights standards.

OBJECTIVE

The objective of this Policy is to provide an overview of guidelines for all of MODEC Group's stakeholders.

MODEC respects and supports the protection of universal human rights, and we conduct our operations consistent with the notion that all human beings are born free and equal, with dignity and rights and with the resolve that we should act towards one another in a spirit of humanitarian fellowship.

MODEC will ensure that we:

- Do not risk the health and safety of our employees, suppliers, subcontractors, customers and community members;
- Avoid harming the environment, lives and well-being of local and indigenous people;
- Support diversity and inclusion, and provide equal opportunity and treatment of all persons in order to eliminate discrimination;
- Treat all employees fairly and honestly regardless of where they work;
- Are not complicit in human rights abuse; and
- Comply with all applicable laws and regulations.

Our business practices strive to:

- Establish MODEC's commitment and respect for international human rights standards;
- Maintain MODEC's high ethical standards;



- Inform customers, Business Partners, employees, suppliers, subcontractors and local community members of our commitment to the protection of global human rights; and
- Contribute to the realisation of human rights within our organization and, ultimately, within the global industry in which we operate.

SCOPE

MODEC expects that all MODEC employees worldwide, anyone doing business for or working with MODEC in any capacity and others acting for and on MODEC's behalf will adhere to the principles set forth in this Policy.

This applies to all worldwide locations where MODEC conducts its business.

PERIODIC REVIEW OF THIS POLICY

The MODEC Group Chief Compliance Officer (CCO) will review and propose updates to this Policy on a periodic basis. If agreed by all of the member of the Company's Management Board who are responsible for this Policy, such shall be implemented and published consistent with current practices.

DEFINITIONS

Business Partners	Includes any joint venture partners, special purpose ("SPC") partners and consortia members.
Chief Compliance Officer (CCO)	The corporate officer primarily responsible for overseeing the MODEC Group's compliance and ethics program.
C&E Designee	Compliance & Ethics Designees are appointed by the CCO and given authority and responsibility to carry out day-to-day operational responsibilities related to this Policy in accordance with the directives of the CCO.
Human rights (or human rights)	Defined broadly to mean universal, inalienable, and fundamental rights inherent to all human beings, regardless of nationality, race, sex, gender, sexual orientation, ethnicity, language, religion, place of residence, or any other similar status.



MODEC GROUP HUMAN RIGHTS POLICY**1.0 OVERVIEW OF PRINCIPLES**

MODEC respects all human rights and requires those with whom it does business to respect all human rights.

MODEC conducts its business in a manner that respects the rights and dignity of all people, complying with all applicable international human rights laws and regulations.

MODEC's expectations reflect our commitment to respecting the protection of internationally recognised human rights.

1.1 NO USE OR SUPPORT OF CHILD LABOUR

MODEC does not

- engage in or support the use of persons below 15 years of age or, if higher, the legally prescribed minimum age;
- expose persons under the age of 18 to any situations, in or outside of the workplace, that are hazardous or unsafe to their physical and mental health and development; or
- interfere with mandatory schooling of children.

1.2 NO USE OR SUPPORT OF FORCED OR COMPULSORY LABOUR

MODEC does not

- engage in or support the use of forced or compulsory labour, including prison labour;
- require 'recruitment fees' or 'deposits' from workers - financial or otherwise;
- withhold salary, benefits, property or documents to force personnel to continue work; or
- engage in or support human trafficking in any form.

1.3 PROVIDE A SAFE AND HEALTHY WORKPLACE

MODEC does

- provide a safe and healthy workplace and prevent potential occupational accidents;
- appoint senior management to ensure health and safety and provide instructions on health and safety for all personnel;
- implements robust systems to detect, avoid and respond to risks, and to record all accidents; and
- provide required personal protection equipment and medical attention in the event of work-related injury.



1.4 RESPECT FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

MODEC respects the right to form and join trade union(s) and bargain collectively, or to have recognised employee representation in accordance with local law. Where local law restricts such rights, MODEC allows workers to freely elect their own representatives.

MODEC ensures no discrimination against union members, workers' representatives or personnel engaged in workers' organization.

1.5 NO DISCRIMINATION

MODEC does not

- discriminate based on race, national or territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions, age or any other condition that could give rise to discrimination;
- discriminate in regard to: hiring, setting remuneration, access to training, promotions, termination decisions, and retirement;
- interfere with the exercise of its employees' personal tenets or practices; or
- tolerate threatening, abusive, exploitative, coercive behaviour at the workplace or MODEC facilities.

1.6 REASONABLE AND FAIR DISCIPLINARY PRACTICES

MODEC treats all personnel with dignity and respect.

MODEC does not engage in or tolerate: the use of corporal punishment, mental or physical coercion, verbal abuse of personnel, or harsh or inhumane treatment of personnel.

1.7 REASONABLE AND FAIR WORKING HOURS

MODEC complies with applicable laws, collective bargaining agreements (where applicable) and industry standards on working hours and public holidays.

1.8 REASONABLE AND FAIR REMUNERATION

MODEC complies with all applicable laws and regulations regarding pay practices and classification of employment according to job level and status.

2.0 MONITORING, RISK ASSESSMENT AND AUDIT

The MODEC Group CCO will

- ensure MODEC operations comply with this Policy and MODEC is periodically audited for compliance with this Policy by qualified internal or external auditors;
- on a periodic basis, ensure MODEC conducts assessments of its risk of violating international human rights; and



- propose the Company Management Board the update of this Policy to address findings from audits and assessments, as required.

3.0 COMPLIANCE

All MODEC Group stakeholders are expected to comply with these human rights guidelines.

MODEC reserves the right to take all available and appropriate action in the event any MODEC Group stakeholder violates any of these guidelines or refuses to cooperate in their implementation.

Specific to these guidelines, MODEC Group stakeholders are expected to:

- never infringe on human rights; and
- be alert to any evidence of human rights infringements in our operations and to report any situation in which a human rights infringement is suspected.

4.0 REPORTING CONCERNS

Any person may report suspected violations of this Policy on a confidential and anonymous basis by calling the independent, toll-free, MODEC Ethics Hotline or by using the MODEC Ethics Hotline web portal. Country-specific Hotline telephone numbers are listed and the Hotline web portal is accessible at www.modec.ethicspoint.com. MODEC employees may also report their concerns to their supervisor, the Human Resources Department, the Legal Department, the MODEC Group CCO, C&E Designee, the Compliance Committee, or to any member of management, or statutory corporate auditors.

5.0 ADDITIONAL INFORMATION

For MODEC employees, contact your supervisor, any member of management, the Contracts or Legal Department, the Compliance Department or the MODEC Ethics Hotline with any questions regarding this Policy.

6.0 REFERENCES

This policy shall be read in conjunction with MODEC Code of Business Conduct and Ethics, and MODEC Corporate Social Responsibility Policy.

For further information regarding human rights, please refer to:

- Universal Declaration of Human Rights:
<http://www.un.org/en/universal-declaration-human-rights/index.html>
- International Labour Organisation Declaration on Fundamental Principles and Rights at Work:
<https://www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm>