

MODEC Corporate Social Responsibility Policy

1.0 PURPOSE & SCOPE

At MODEC, we value our world and the global environment. As we fulfill our commitments to our customers, partners and each other, MODEC is committed to ensuring that our people and our activities are responsible toward the environment and that they offer benefits and advantages to people throughout the world. This Corporate Social Responsibility (“CSR”) policy is MODEC’s commitment to our stakeholders (customers, employees, shareholders, suppliers and the communities where we operate) to conduct business in an economically, socially and environmentally sustainable manner that is transparent and ethical. The purpose of this CSR policy is to summarize the ways in which MODEC supports these commitments.

This policy applies to MODEC, Inc. and its subsidiary companies.

2.0 SOCIAL RESPONSIBILITY

Corporate Governance

MODEC established its corporate governance system in accordance with the fundamental principles of strict procedural compliance, a focus on shareholder returns and ensuring business transparency. We are committed to ensuring that our business is conducted according to highest standards of ethics, integrity and corporate governance practices. MODEC’s Corporate Governance Guidelines set the basic framework and philosophy of the Corporate Governance of MODEC and contribute to furthering of the sustainable growth and corporate value of MODEC. MODEC’s Corporate Governance Guidelines are available at <http://www.modec.com/ir/governance/index.html>.

Human Rights

MODEC respects and supports the protection of universal human rights. MODEC conducts our global operations in the spirit that all human beings are born free and are equal in dignity and rights and believes that MODEC employees should act towards one another in a spirit of brotherhood. As part of this commitment, MODEC does not employ underage workers or forced labor (involuntary labor or any kind including prison labor, debt bondage, or forced labor by the government) and will not knowingly partner with a supplier, third party or business partner that illegally or improperly employs underage workers or forced labor.

MODEC will ensure that our policies and procedures:

- Do not risk the health and safety of our employees and community.
- Avoid harming the lives of local and indigenous people.
- Support diversity and inclusion.
- Comply with all applicable laws and regulations.



Hiring and Labor Practices

MODEC is committed to providing equal employment and career opportunities to all employees, applicants for employment, and qualified individuals regardless of race, color, religion, sex, sexual orientation, national origin, disability, military status, or any other characteristic protected by applicable national and local laws or regulations. MODEC will not tolerate discrimination based on these or any other legally protected categories. To that end, we promote a work environment of diversity and inclusion with respect and trust for our employees and applicants for employment.

Our employees observe high standards of business and personal ethics, including honesty, integrity and fair dealing in interactions with all stakeholders.



Environment, Health & Safety Accountability

Drawing from our Mission & Vision statements MODEC is committed to conducting all business activities in a responsible manner, which assures the health, safety, and security of people, preservation of the environment, quality of the products/services, and compliance with all applicable legal and regulatory requirements in countries where we operate. MODEC achieves this business ethic by utilizing an integrated Health, Safety, Environment, and Quality (“HSEQ”) management system. This provides a structured approach to identify and reduce the risks associated with MODEC’s activities to levels that are as low as reasonably practicable.

MODEC recognizes its responsibility to conduct business in a way that protects and, where possible, improves the state of the environment for future generations. This is achieved by utilizing a strategy that promotes environmentally safe designs, construction and operations in all MODEC’s activities.

MODEC is committed to observing and meeting or exceeding applicable environmental laws, ordinances, and regulations in all jurisdictions MODEC does business.



Code of Business Conduct and Ethics

MODEC takes pride in performing our business in compliance with all legal requirements and the highest standards of integrity. Our Code of Business Conduct and Ethics (the “Code”) has been developed to ensure that all directors, officers, and full-time and part-time “Employees” of MODEC adhere to the legal and ethical standards that apply to our operations, our work environment, our business relationships, and our values. MODEC is committed to complying with all applicable laws, regulations, and statutory obligations in the countries where MODEC operates. MODEC also acts in accordance with the highest ethical standards underscored by MODEC’s values, which include respect for human rights, openness, honesty, and safety in all we do.

MODEC conducts business free from the influence of bribery and corruption. Employees and third parties are expected to be aware of and follow all anti-corruption and bribery laws everywhere MODEC does business.

Any person may report suspected legal or ethical violations on a confidential and anonymous basis by calling the independent, toll-free, MODEC Ethics Hotline (the “Ethics Hotline”) or by using the Ethics Hotline portal. MODEC employees are encouraged to speak with the person with whom they feel most comfortable. All reported concerns are promptly investigated. MODEC strictly prohibits retaliation against employees who report potential or suspected ethical or legal violations in good faith.

The full MODEC Code of Business Conduct and Ethics is available at <http://www.modec.com/about/commitment/index.html>.

Community Development Support

MODEC strives to understand and respect the cultural values and laws wherever we operate. To support local community efforts, MODEC may preserve a budget to make social contributions pursuant to MODEC’s Group Social and Political Contributions Policy in compliance with anti-corruption laws and regulations. These social contributions will aim to:

- Advance education and cultural or community events.
- Alleviate the burdens of those in need.
- Provide MODEC, Inc.’s Management Board with opportunities to make a positive impact in areas of need.

