



STECONFER
GLOBAL RAIL INFRASTRUCTURE

TRANSPARENCY ACT COMPLIANCE STATEMENT

I. Overview of Steconfer's Commitment

At Steconfer, we firmly uphold the principles of the Norwegian Transparency Act (Lov om virksomheters åpenhet og arbeid med grunnleggende menneskerettigheter og anstendige arbeidsforhold). This commitment is not only a legal obligation but a core element of our corporate ethos. The Act mandates businesses to actively respect fundamental human rights and decent working conditions, and it provides the public with essential access to information about how companies like ours manage and mitigate negative impacts in these areas.

II. Our Corporate Vision and Ethical Standards

Our vision at Steconfer goes beyond just compliance. We integrate the Act's principles into our "Code of Ethics and Business Conduct," which sets the benchmark for behavior across our organization. This Code is non-negotiable and universally applicable, ensuring that our business practices are always aligned with the highest ethical standards.

III. Health, Safety, and Non Non-Discrimination

We are dedicated to fostering a culture of health and safety, actively developing risk awareness, and promoting responsible behavior among all employees, partners, and suppliers. This includes a strict policy against discrimination and harassment in any form – be it based on ethnicity, origin, nationality, religion, race, gender, age, sexual orientation, or any other characteristic. Our commitment to a safe and inclusive work environment is unwavering.

IV. Supplier and Partner Expectations

We expect our suppliers and partners to mirror our high ethical standards. This means a zero zero- tolerance policy for corruption, bribery, embezzlement, unfair competitive practices, discrimination, or harassment. We require that our suppliers respect human rights comprehensively, extending throughout their entire value chain when they engage in business with us. These expectations are clearly outlined in our ethical guidelines for suppliers and our stringency requirements.

V. Right to Information and Contact

In accordance with Section 6 of the Transparency Act, we acknowledge the public's right to request information about how Steconfer addresses the adverse impacts on fundamental human rights and decent working conditions. For any inquiries or further information regarding our practices and policies in these areas, please contact us at geral@steconfer.com. We are committed to transparency and will respond to such requests in a timely and comprehensive manner.

Signature of Directors:



Luís Bairrão



Rui Costa



Leonardo Santos