

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

We, Triangle's – Cycling Equipments, S.A., make this statement pursuant to the 2016 amendment proposal to the Anti-Trafficking Directive of the Directive 2011/36/EU of the European Parliament, referenced as COM(2016) 267 final.

INTRODUCTION

We acknowledge and respect our obligations under the Directive and are committed to improving our practices to eradicate slavery and human trafficking.

This statement outlines our policies and actions to understand all potential modern slavery and human trafficking risks and take the necessary steps to address those risks and prevent instances within our business and across the supply chain.

ORGANIZATION STRUCTURE

Triangle's – Cycling Equipments, S.A. is a company with an automated production of e-bike frames, using innovative technology in aluminum processing. The company is part of Semapa Group, a Portuguese investment holding company determined to build a diversified portfolio of companies, capable of creating long-term and sustainable growth cycles, bringing together the best talent to create a positive impact on the world.

SUPPLY CHAIN

Our supply chain includes aluminum producers, packaging manufacturers and service providers located from within Portugal and internationally. As part of our procurement policies, we evaluate and require our suppliers to provide information about their ethical trading systems and practices in their businesses. As part of our ESG strategy to identify and eradicate modern slavery risks, we are committed to develop closer and transparent relations with our suppliers and their businesses.

OUR EMPLOYEES

We have robust and frequent audit procedures to ensure fair and compliant practices are adopted and to prevent labour exploitation and modern slavery in temporary and non-temporary jobs.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

We operate in accordance with Triangle's Code of Conduct and Suppliers Conduct Policy. We hold membership with ASI – Aluminium Stewardship Initiative and are certified by ISO 9001, ISO 14001 and ISO 45001. We also perform independent audits to ensure our systems and standards are legally compliant, fit for our business and are sufficiently maintained.

HUMAN RIGHTS DUE DILIGENCE PROCESS

We provide all of our employees with employment rights information at the beginning of their enrolment at Triangle's and ongoing relevant information in significant governance matters such as Anti-corruption policies, Whistleblowing policies and channels, Human Rights and labour condition policies, as well as our Purpose and Values, outlined in our Code of contact. We provide specific compliance training to all employees, and encourage our workforce to report any related concerns, by providing an independent whistleblowing channel that ensures employees a safe and confidential channel.

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