

# Quality, Health, Safety and Environment (QHSE) Policy

March 2026

## Quality, Health, Safety and Environment (QHSE) Policy

Modela establishes this Integrated QHSE Policy as the overarching framework that guides how we deliver our services, protect people, steward the environment, uphold business integrity and safeguard information. It sets the standards we expect across the organisation and informs decision-making at every level.

This Policy is a clear statement of management's commitments and must be read as such; it is not a substitute for the specific technical, operational or contractual procedures that implement these commitments in practice. Where detailed procedures exist, they govern day-to-day operations.

### 1. Purpose

The purpose of this policy is to set out Modela's cross-cutting commitments on quality, health and safety, environment, integrity, information protection and continuous improvement, in a way that is consistent with operations that are technically defensible, traceable and proportionate to the scope of our services.

These commitments ensure that our work is delivered to standards that can be justified on technical grounds, fully audited and scaled appropriately to each engagement, supporting reliable outcomes and continuous improvement across the organisation.

### 2. Scope

This Policy applies to Modela's activities, services, internal processes and working relationships, including its managers, employees, advisers, contractors and any third parties acting on its behalf or under its operational control.

It covers all work carried out for or on behalf of Modela and the people and organisations engaged in delivering those services, regardless of location, where Modela has the authority to set standards or influence operational practice.

### 3. Management principles

At Modela we recognise that technical trust depends not only on the result but also on how that result is produced, reviewed, documented and communicated. For this reason, we operate according to the principles of traceability, proportionality, prevention, change control, continuous improvement, expert review and compliance with applicable requirements. These principles guide our day-to-day decisions and ensure that outcomes are robust, auditable and defensible.

Our management approach is aligned with recognised good practice and international management-system standards, particularly in quality, environmental and health-and-safety management. This alignment is intended to ensure consistency with established frameworks; it should not be read as implying formal equivalence or certification where none exists.

## 4. Quality and technical integrity commitments

We commit to defining the scope of each service, documenting its assumptions, identifying relevant inputs, controlling changes and communicating clearly any limitations, warnings and conditions of use. Each engagement will have a documented boundary and record of the decisions that shape its outputs.

We commit to systematic verification, technical review and document control. Empirical validation or external corroboration of results will be carried out where the scope, the availability and quality of data, the criticality of the intended use or the contractual form of the service permit or require it.

No result will be presented as universal, free from error or suitable for all purposes. All technical communications must be consistent with the actual domain of applicability covered by the work.

## 5. Health and safety commitments

We commit to providing and promoting safe and healthy working conditions, to identifying hazards and assessing risks in a proportionate manner, to implementing preventive measures, and to fostering a culture of timely reporting.

No commercial or technical objective justifies exposing people to uncontrolled risks. Modela recognises the duty and authority to stop unsafe work and prohibits any retaliation against those who act in good faith to protect life, health or physical integrity.

Where service delivery involves site visits, field surveys or other activities with operational risk, we will require prior coordination, compliance with the host site's requirements, appropriate competence for the task and preventive measures consistent with applicable law and good practice.

## 6. Environmental commitments

We commit to identifying and considering the material environmental aspects and impacts of our operations and the services we provide, to complying with applicable law, and to promoting informed decisions that favour efficient resource use, impact prevention and improved environmental performance where the scope of the service allows.

We will not use environmental language as a substitute for evidence. Any claimed benefits, efficiencies or impact reductions must be supported by the actual scope of the service, the assumptions made and the limitations declared.

## 7. Integrity, information protection and intellectual property

We commit to safeguarding the confidentiality, availability and integrity of the information to which we have access, together with our own and third-party intellectual property. Information, models, code, files and outputs may only be used for authorised purposes and must be subject to controls proportionate to their criticality.

Modela will implement reasonable access controls, document retention and authorised-use rules for digital tools. The inclusion of client confidential information, proprietary material or sensitive data in unauthorised tools or environments is prohibited.

## 8. Compliance, incidents and continuous improvement

We are committed to complying with applicable law, our contractual obligations and other requirements relevant to our activities. We will maintain mechanisms to record incidents, deviations, non-conformities, observations and opportunities for improvement, and to define corrective and preventive actions that are proportionate to the issue identified.

Continuous improvement at Modela is not about making broader promises; it is about strengthening controls, improving documentary clarity, developing technical competence and ensuring consistency between what we declare and what we deliver.

## 9. Responsibilities

Modela's Management is responsible for approving this Policy, appointing those accountable for its implementation, reviewing it periodically and providing the minimum resources required for compliance.

Everyone acting on behalf of Modela must be familiar with this Policy, comply with it and cooperate with the controls, reporting and reviews that flow from it.

Those responsible for procurement, project management, security and compliance must ensure this Policy is translated into practices, procedures and decisions that are consistent with its content.

## 10. Communication, engagement and competence

Modela will promote the communication of this Policy to relevant people, provide training proportionate to the risks, and encourage consultation or participation where appropriate, especially on matters of health and safety, integrity and third-party management.

We will ensure that those affected understand their responsibilities and have the competence and opportunities to contribute to safe, compliant and high-quality outcomes.

## 11. Review and document control

This Policy will be reviewed at least once a year, and sooner if there are material changes to operations, to relevant risks, to the applicable regulatory framework or to the scope of our services.

The current version must be kept under document control, clearly identifiable and available in the Compliance Centre and on the appropriate internal channels.

## Approval

Approved by: Board of Directors of Modela Ltd.

Effective: from the date of publication.

Next review: March 2027, or earlier if required.



Rafael Muñoz Rubilar  
Compliance Officer