



Labor Practices & Human Rights Policy

Letter from the Operations Director

At Blue Diamond Deluxe Private Transports, our people are the foundation of our success. The quality of the services we provide is a direct reflection of the professionalism, commitment and integrity of every member of our team. For this reason, we are committed to creating a workplace where every employee is treated with dignity, respect and fairness, while being provided with the opportunity to develop professionally in a safe, healthy and inclusive environment.

We recognize that respecting labor practices and human rights is not only a legal obligation but also a fundamental responsibility that strengthens our organization, enhances the well-being of our employees and contributes to the long-term sustainability of our business.

As a provider of premium private transportation services, we strive to foster a corporate culture built on respect, equal opportunities, diversity, continuous learning and responsible employment practices. We are committed to complying with all applicable labor legislation and internationally recognized human rights principles, while promoting a workplace free from discrimination, harassment, forced labor, child labor and any form of abuse.

This Labor Practices & Human Rights Policy establishes the principles that guide our employment practices and reflects our commitment to continuously improving the well-being, development and engagement of our employees.

Our policy supports the United Nations Sustainable Development Goals (SDGs), particularly SDG 3 (Good Health and Well-being), SDG 5 (Gender Equality), SDG 8 (Decent Work and Economic Growth) and SDG 10 (Reduced Inequalities).

Every employee contributes to maintaining a respectful, inclusive and safe working environment. Together, we keep building a company where people are valued, supported and empowered to deliver excellence every day.

1. Scope

This Labor Practices & Human Rights Policy applies to all employees, managers, and contractors working for or on behalf of Blue Diamond Deluxe Private Transports.

The policy governs all employment-related activities, including recruitment, working conditions, occupational health and safety, employee development, equal opportunities, diversity, professional conduct and respect for internationally recognized human rights.



Blue Diamond is committed to complying with all applicable labor legislation in Portugal, relevant international labor standards and internationally recognized human rights principles, including those promoted by the International Labour Organization (ILO) and the United Nations Global Compact.

2. Our Guiding Principles

Blue Diamond is committed to conducting all employment practices with integrity, fairness and respect for human dignity. Our approach to labor practices and human rights is guided by the following principles, which underpin every employment-related decision and support the long-term sustainability of our business.

Respect for Human Rights

We are committed to respecting and promoting internationally recognized human rights in all aspects of our operations. We reject all forms of child labor, forced labor, human trafficking, discrimination and any practice that compromises the dignity, freedom or fundamental rights of individuals.

We strive to foster a workplace built on mutual respect, trust and equal treatment for everyone.

Health, Safety and Well-being

The health, safety and well-being of our employees are fundamental priorities.

We are committed to providing a safe and healthy working environment through preventive risk management, safe driving practices and continuous awareness of workplace safety.

Every employee shares responsibility for maintaining a safe working environment and preventing occupational risks.

Diversity, Equity and Equal Opportunity

We believe that diversity strengthens our organization and contributes to innovation, professionalism and better decision-making.

We are committed to providing equal opportunities throughout the entire employment lifecycle, including recruitment, remuneration, promotion, training and career development, based solely on merit, competence and professional performance.

Blue Diamond maintains zero tolerance towards discrimination, harassment, bullying or any behavior that undermines inclusion, dignity or mutual respect.



Fair Employment and Professional Development

We are committed to providing fair working conditions that comply with applicable labor legislation and internationally recognized labor standards.

We believe that continuous learning is essential to both individual and organizational success. We therefore encourage professional development through regular training, performance evaluations, knowledge sharing and continuous improvement.

By investing in our employees, we strengthen our ability to provide exceptional service while supporting long-term sustainable business growth.

Dialogue, Respect and Continuous Improvement

We encourage open communication, constructive dialogue and active employee participation in the continuous improvement of our workplace.

Employees are encouraged to raise questions, share ideas and report concerns in good faith through appropriate communication channels without fear of retaliation.

We believe that maintaining a culture based on transparency, accountability and continuous improvement strengthens employee engagement, organizational resilience and the long-term success of Blue Diamond.

3. Labor Practices & Human Rights Policy Objectives

Objective 1

Protect the health, safety, well-being and fundamental human rights of all employees by providing a safe, respectful and supportive working environment.

To achieve this objective, Blue Diamond is committed to:

- Maintaining full compliance with Portuguese labor, occupational health and safety legislation.
- Providing a safe and healthy working environment through preventive risk management.
- Promoting safe and defensive driving practices among chauffeurs to protect employees, passengers and other road users.
- Maintaining occupational accident insurance for all employees and health insurance benefits where applicable.
- Prohibiting child labor, forced labor, human trafficking and any form of exploitation.



- Respecting employees' privacy, dignity, freedom of association and internationally recognized human rights.
- Providing confidential channels through which employees may report concerns without fear of retaliation.

Objective 2

Promote an inclusive workplace that values diversity, equal opportunities, fair working conditions and mutual respect.

To achieve this objective, Blue Diamond is committed to:

- Applying fair, transparent and merit-based recruitment, remuneration and promotion practices.
- Ensuring equal opportunities regardless of gender, age, nationality, ethnic origin, religion, disability, sexual orientation or any other legally protected characteristic.
- Maintaining zero tolerance for discrimination, harassment, bullying or any inappropriate workplace behavior.
- Promoting respectful professional relationships based on dignity, integrity and inclusion.
- Providing fair working conditions, legal employment contracts and compliance with applicable working hours, remuneration and social protection requirements.
- Encouraging open communication and constructive dialogue between employees and management.

Objective 3

Invest in employee competence, continuous learning and professional development to support service excellence and sustainable business growth.

To achieve this objective, Blue Diamond is committed to:

- Developing and implementing an annual training program based on operational needs and employee development.
- Providing regular training in customer service excellence, defensive driving, eco-driving, health and safety, sustainability and ethical business conduct.
- Encouraging employees to strengthen their professional competencies, including foreign language skills and customer care.
- Conducting periodic performance evaluations to identify strengths, development opportunities and future training needs.



- Promoting knowledge sharing and continuous learning across the organization.
- Recognizing employee contributions and encouraging individual development aligned with the company's long-term objectives.

3. Labor Practices & Human Rights Performance Indicators (KPIs)

Blue Diamond monitors the implementation of this policy through the following Key Performance Indicators:

KPI	Target	Monitoring Frequency
Employees covered by occupational accident insurance	100% of employees	Annual
Serious occupational accidents	Zero	Continuous
Confirmed human rights violations	Zero	Continuous
Confirmed cases of discrimination or harassment	Zero	Continuous
Employees working under legal employment contracts	100% of employees	Annual
Performance evaluations completed	100% of employees	Annual
Employees receiving annual training	100% of employees	Annual
Training delivered	20 to 40 hours per year	Annual
Employee concerns addressed through confidential reporting channels	100% of reported cases	Continuous

4. Monitoring and Responsibilities

The implementation of this Labor Practices & Human Rights Policy is overseen by the Operations Director, who is responsible for ensuring compliance with labor legislation, monitoring employee well-being, promoting professional development and supporting a workplace based on fairness, dignity and respect.

All employees are expected to comply with this policy, contribute to maintaining a safe and respectful working environment and immediately report any situation that may compromise employee welfare or human rights.



Policy implementation is monitored through performance evaluations, training records, occupational health documentation, workplace observations and periodic reviews of the KPIs established within this policy.

Whenever opportunities for improvement are identified, corrective actions will be implemented to strengthen the company's labor practices and human rights management system.

5. Policy Review

This Labor Practices & Human Rights Policy shall be reviewed at least once every year, or earlier whenever significant legal, operational or organizational changes occur.

The annual review will evaluate:

- Achievement of established KPIs.
- Compliance with applicable labor legislation and internationally recognized human rights principles.
- Feedback received from employees.
- Results of training and professional development activities.
- Workplace health and safety performance.
- Opportunities to improve employee well-being, inclusion and professional development.

Any revisions to this policy shall be approved by the Operations Director and communicated to all employees and relevant stakeholders.

Approved by

Marco Fidalgo
Operations Director
Blue Diamond Deluxe Private Transports

Effective Date: January 2026

Next Scheduled Review: January 2027