



CODE OF ETHICS AND BUSINESS CONDUCT



Data Sheet

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Entity in Charge: Ethics and *Compliance* Committee.
Approval: Board of Directors.

Implementation: March/2016.
Revision 01: December/2018.
Revision 02: August/2020.
Revision 03: September/2022.



MESSAGE FROM OUR PRESIDENT

ECB has been standing out in the Brazilian construction market for the large projects it executes, but also for the values that guide its attitudes.

Among these values, I would like to highlight **Integrity and Transparency** as the starting point for the performance of our work activities.

Our Code of Ethics is our guide in the constant, relentless pursuit of proper conduct that, together with other Compliance Program *and* Company guidelines, sets standards to ensure that we are all able to act in accordance with what we believe to be right.

It is of utmost importance that all our employees and partners read, understand, and practice the rules set forth herein.

We count on everyone's collaboration so that our actions are based on honesty and integrity, with consistent ethical principles and values, being aware of our responsibilities before the market and society. In this sense, I would like to extend an invitation to everyone to share with us not only the duties, but also the benefits of the ethical and respectful behavior that we seek to achieve through our Code.

Remember: **We are what we do**, and everything we do is guided by our values.

Miller Soares Rufino Pereira
ECB President

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1. OUR CODE OF ETHICS AND BUSINESS CONDUCT

1.1 Object

The legacy of **Empresa Construtora Brasil-ECB** and Mota-Engil is written in more than 70 years, marked by a corporate culture of innovation, dedication, commitment, professionalism, and integrity.

The purpose of this Code of Ethics and Business Conduct is to define the principles and rules, of an ethical and business nature, that guide employees and third parties, and constitute the basis of behavior that our Group requires, enshrining the Mission, Values and Vision that integrate the Group's business culture.

The business ethics of our Group, formed by **ECB** and Mota-Engil, is based on compliance with criteria that promote the values, culture, its management model, and respect for individuals and their rights.

This Code became effective in 2016 and is periodically reviewed by the Ethics and *Compliance* Committee, which is approved by the Company's Board of Directors.

1.2 Scope of Application

This Code applies to all individuals working at all levels and categories of the Group, including managers, officers, directors, employees (permanent, fixed-term or temporary), consultants, advisors, contractors, subcontractors, suppliers, interns, or any other person associated with the Group, wherever located.

The Group also expects its business partners to adopt the same standards in their dealings with the Company and its representatives. Everyone must respect this Code in the performance of their daily tasks, as it formulates the behavioral model consistent with our Group's corporate culture. In this sense, whenever this Code uses the expression "collaborator", it should be understood that it includes any and all persons defined in this point 1.2.

1.3 Relationship Between the Code and Other Company Policies

This Code should be interpreted in conjunction with all documents comprising the Group's *Compliance* Program, such as internal procedures, policies, and the supplementary rules and procedures adopted from time to time by our Group, which are made available on the intranet.

1.4 Monitoring and Compliance

The Company has an Ethics and *Compliance* Committee, a body created by the Board of Directors, which is responsible for ensuring the effectiveness of this Code, as well as for conducting the review of the principles contained herein.

Our Group is committed to complying with this Code and to applying its principles in its relationships with shareholders, partners, customers, suppliers, employees, and the community. It is the duty of the Board of Directors, the Executive Board, the Ethics and *Compliance* Committee, managers and team leaders to set the example, guide and support their teams in complying with this Code.

The constant monitoring allows the identification of eventual errors or failures and enables their correction, as well as providing the improvement of policies and procedures adopted.

In this sense, the Group collects information, through various sources, such as the channels made available for denunciation, analyzes it and, in case of irregularities, proposes the applicable measures and sanctions.

This information is converted into reports, which makes it possible to track the evolution of the results of the implementation of the policies addressed in this Code.

2. VISION, MISSION, AND VALUES



3. OUR RESPONSIBILITIES AT WORK

3.1 Compliance with laws, rules, and regulations

At all times, it is the duty of all employees to respect and comply with all laws, rules, regulations, and professional standards applicable in the location in which they are working or in which the Group operates.

With regard to Anti-Corruption and Bribery, Prevention of Money Laundering and Financing of Terrorism, our Group is subject to national legislation, such as, but not limited to, Law No. 12.846/13 and Decree No. 11.129/22, and the international legislation, among which we can highlight the *Foreign Corrupt Practices Act* (FCPA) and *UK Bribery Act*, as well as the recommendations issued by intergovernmental bodies such as the Organization for Economic Co-operation and Development (OECD) and the Financial Action Task Force (FATF).

3.2 Corporate Governance

Our Group is managed with transparency and in compliance with the rules, guidelines, and principles of good corporate governance, in accordance with the Group's commitment to its shareholders, partners, customers, suppliers, employees, and the community.

3.3 Conflict of Interest

Employees have a responsibility to act in the best interests of the Company and must not act in a manner that conflict with that responsibility and interests.

A conflict of interest arises when personal interests interfere with the interests of the company; when professionals use the company, their function or their internal influence for personal interests or to benefit third parties.

Accordingly, employees must abstain from representing our Group, influencing decisions in which, directly or indirectly, they have any personal interest, or in which companies with which they collaborate or have collaborated intervene.

Here are some situations that can be configured as conflict of interest:

- ◆ Holding a public office or position, currently or in the last 5 years; having close
- ◆ relatives in decision-making positions in public bodies; Holding a second job;
- ◆ The existence of relatives in the same work unit, regardless of the degree of subordination between them;
- ◆ Contracting services and products with companies owned by our Group's employees or their relatives; or due to a friendship or kinship with those contracted; Use or disclosure of privileged,
- ◆ confidential or secret information; Receiving gifts or advantages from suppliers; Hiring an
- ◆ employee due to ties of friendship or kinship.

If functions are performed outside Group companies, the use of any material or technological means or resources, including computer or e-mail resources, belonging to our Group in the performance of these functions is prohibited.

If any of the situations mentioned above, or any other situation that may configure an actual, potential, or apparent conflict of interest, the Ethics and *Compliance* Committee must be informed so that the situation can be evaluated and the appropriate measures can be adopted.

3.4 Corruption and Bribery

Our Group has adopted a zero-tolerance policy on corruption (active and passive) and bribery in the public and private sectors and is committed to complying with anti-corruption and bribery legislation across the board. Any and all fraudulent practices are also prohibited.

For more information, please see the Group's Anti-Bribery and Corruption, Anti-Money Laundering and Terrorist Financing Policy, which defines your responsibilities regarding compliance with applicable laws, rules and regulations.

3.4.1 Offer, Gift, and Hospitality

Employees, senior management, including managers of Group Companies, shall not give, promise to give, offer, or accept any payment, gift, or hospitality in the expectation or hope that a business advantage will be granted or achieved, or to reward anyone for a business advantage already granted, whether such person is in the public or private sphere.

For more information, see the Group's Present, Gift and Hospitality Procedure.

3.4.2 Relationship with Government and Authorities

In matters of public policy, our Group does not usually take any direct or indirect positions or contribute to political organizations.

Our Group is obliged to comply with all national and international legislation in force in any state in which it does business. One should not give, promise to give or offer payments, gifts or hospitality to a state official to facilitate or expedite any business activity.

3.5 Money Laundering and Terrorist Financing

Our Group is committed to combating money laundering and terrorist financing, to preventing and avoiding any form of use of the Group for illegal or illicit activities, and to avoiding any other activity that does not fall under the applicable legislation in all jurisdictions in which it operates.

For more information, see our Policy on Anti-Corruption and Bribery, Prevention of Money Laundering and Terrorist Financing, which deals with compliance with laws, rules, and regulations on this subject.

3.6 Relationship with Customers, Suppliers, and Service Providers

Measures are taken to ensure that the Group only maintains business relationships with companies and individuals who are aware of this Code and who share its standards of ethics and integrity.

Any violation of this principle must be reported directly to the Ethics and *Compliance* Committee or through the available whistleblowing channel.

Hiring must be based on ethics and integrity. In this sense, a *due diligence* procedure is carried out for risk assessment, prior to contracting, of third parties considered strategic to the Group. For more information about the requirements of this process, please see the Third-Party *Due Diligence* Procedure.

The relationship between the parties is based on transparency. This Code of Ethics and the Anti-Corruption and Bribery Policy are made available to all third parties to consult.

3.6.1 Customer Relationship

Our Group and its employees must act with integrity, rigor and efficiency, providing a service of quality and excellence, helping to maintain and strengthen the relationship of trust with customers and the Group's good image and reputation.

3.6.2 Relationship with Customers, Suppliers, and Service Providers

The selection of suppliers or service providers must be made according to market conditions and quality and cost criteria, in an independent and objective manner.

To ensure the integrity of the relationship, the company has in its contracts a clause that provides for contract termination in case of harmful acts against the national or foreign government.

The Company must negotiate in compliance with the principle of good faith and honor its commitments according to the contractually defined standards.

3.7 Media

The information provided to the media and through advertising must be informative and truthful, respect the cultural and ethical parameters of the community and the dignity of the human person, and contribute to the image of our Group.

In this principle, employees must follow the established communication policy, publicly representing our Group with statements on matters of strategic and/or institutional relevance only in cases where they are clearly and duly authorized.

The employee, regardless of their function, when communicating about and for the Company, must position themselves responsibly without violating the provisions of this Code. This means, in many situations, maintaining discretion and privacy. Comments, personal opinions, and conflicting situations, whether positive or not, should be avoided and dealt with internally with those responsible.

3.8 Community Relationship

3.8.1 Human Rights

Our Group respects and promotes human rights in all cultural, socioeconomic, and geographic contexts where it operates, respecting the respective traditions and cultures, and promoting support for local communities in accordance with the specific interests of each region.

3.8.2 Child, Forced and Slave-Like Labor

Our Group prohibits any situation of child, forced, or slave-like labor. Likewise, it prohibits contracting or collaborating in business with companies that practice such acts.

In this sense, to ensure the above, the Company has clauses in its contracts that provide for such impediments.

3.8.3 Social Responsibility

Our Group is committed, in corporate and institutional terms, to pursue and strengthen its sustainability strategy in a firm commitment to ethical, socially, and environmentally responsible management. Our Group's Social Responsibility Program integrates the following general objectives:

- ◆ Value Creation
- ◆ Eco-efficiency and innovation
- ◆ Environmental Protection
- ◆ Business Ethics
- ◆ Dialogue with Stakeholders Human
- ◆ Capital Management; and
- ◆ Support for Social Development

The Group is committed to contributing to a more just and prosperous society, reconciling economic growth, social cohesion and environmental protection and, in this way, ensuring the improvement of the quality of life for current and future generations.

3.8.4 Environmental Sustainability

Our Group is committed to promoting environmental sustainability actions in the execution of its activities, encouraging the use of natural resources responsibly, and taking into account the best practices and techniques to be developed in its activities.

Respect for and protection of the environment must guide the conduct of all employees. In doing so, we will observe the provisions of environmental laws and regulations in order to respect the environment and future generations.

3.9 ESG

As a goal of its strategic planning, the Group adopts practices of environmental responsibility (Environmental), social responsibility (Social), and corporate governance (Governance), aiming to work towards sustainable objectives that go beyond the role of an organization to maximize profits.

4. PROTECTION OF RESOURCES AND INFORMATION

4.1 Company Assets

This Code requires employees to protect the Group's assets and ensure their efficient use for legitimate business purposes. Theft, negligence, and waste have a direct impact on the Company's profitability. Thus, measures must be taken to prevent the occurrence of damage, theft, or misuse of the Group's property. When the employee leaves the company, all property belonging to the Group must be returned. Except as specifically authorized, the Group's assets, including equipment, materials, resources, and proprietary information, are to be used solely for business purposes.

Employees must protect the Group's property resources and assets as if they were their own, protecting them against misuse, loss, fraud, or theft, and are forbidden to use them after the contractual link with the Group has been broken.

4.2 Company Accounting Records

The Company must record all of its financial activities according to the legislation in force and the applicable accounting practices. All transactions must be properly authorized and fully and accurately accounted for. Postings without appropriate supporting documentation or based on false or misleading documentation are strictly prohibited.

You should never create reports that do not properly and truthfully portray the Company's records, make payments or create accounts in the Company's name with the intention that part of the payment or account will be used for a purpose other than that described in the supporting documents.

The monitoring of expenses and revenues is carried out by the Planning and Control and Management Control departments to avoid the practice of illicit acts against the Group and the Government. The records that offer risk to the Group's integrity deserve greater attention from these internal control departments.

Besides the internal control mentioned above, an independent auditing company of international renown carries out an annual external control work, in order to ensure the transparency, veracity, and reliability of the information.

4.3 Records Retention

Our Group is committed to compliance with applicable record-keeping laws and regulations. All records will be kept for at least the period indicated in these laws and regulations.

Records that are irreplaceable and critical to the continuation of the Company's business, including, but not limited to, accounts receivable and payable, active customer lists, obligations, notes, actions, company bylaws, minutes and associated records, internal memos, approvals and corporate resolutions, mortgages, originals of signed contracts, current and salary personnel records, digital backups, must be identified and stored in a secure location on the Company's premises.

Other business records will only be discarded or destroyed at the time they become clearly obsolete, and which have no business use, are not subject to any legal or regulatory retention period. Only entire groups or categories of records should be routinely destroyed if such destruction is in accordance with current practice and not contrary to the above guidelines, or if specifically approved by the Legal Department and the Board of Directors.

If you become aware of a judicial or extrajudicial proceeding or an investigation, you must retain and preserve all records that may be invoked or relevant to those proceedings until the Legal Department tells you how to proceed. The Legal Department and the Board of Directors must authorize any physical destruction of important documents.

4.4 Confidential Information

In the course of their work, employees may learn facts about the Group's business, plans, operations, or trade secrets that are not known to the public or to competitors. Confidential information includes all non-public financial, technical, operational, commercial, personnel, management or other information, data or *know-how*.

Employees must maintain the confidentiality of information entrusted to them by the Company or its customers or suppliers, except when its disclosure is authorized by the Company or legally required. If you believe that you may have disclosed confidential information, such as by sending an e-mail message to an improper recipient or by leaving documents in a public place, you must immediately report it to your direct supervisor or the Ethics and *Compliance* Committee.

The obligation to treat information as confidential does not end when the employee leaves the Company. Upon termination of employment, you must return everything belonging to the Group, including all documents and other materials that contain confidential information about the Company and customers or suppliers. No confidential information may be disclosed to a new employer.

All resources and assets of a non-public nature made available by the Group are its property, and therefore may not be used by employees for their personal benefit or for private use.

4.5 Prohibition Against Insider Trading

Our Group respects and complies with securities laws, ensuring that inside information is safe and secure.

Inside information is information of a precise nature that is not available to the public and that relates, directly or indirectly, to the Group or its securities; and, if it were made available to the public, would likely have a significant effect on the price of the Group's securities.

In the course of their work at the Company, employees may obtain non-public information about the Company's suppliers, customers or other interlocutors. It is prohibited to buy or sell securities of a listed company, whenever you are in possession of non-public information that, if disclosed, could have a significant effect on the price of the Group's securities. It is also forbidden to pass on this type of information to anyone who might buy or sell securities.

5. FAIR COMPETITION

5.1 Prohibition of Unfair Practices

Our Group is committed to acting fairly toward its customers, suppliers, competitors, and employees. You must never take unfair advantage of a third party through manipulation, concealment, use of privileged information, misrepresentation of material facts, or any other unfair practice.

5.2 Competition Laws

Our Group strictly complies with all applicable competition laws. Due to the complexity of these laws, when any doubt arises on the subject, the Legal Department must be consulted. Any violation of competition laws can determine the liability of the Company, and also of the employee. Despite the impossibility of describing the aforementioned legislation in full in this Code, the following is an overview of the types of conduct that should be avoided. If you are involved or will be involved in activities similar to these, or encounter situations that you believe may raise competition issues, you should immediately consult the Legal Department or the Ethics and *Compliance* Committee for further guidance.

For more information, see our Fair Competition Policy.

5.2.1 Conspiracies and Collaborations between Competitors

Competition laws promote and preserve the independence of each competitor in making decisions about price, production, and other competitively sensitive factors. Competition infringements are committed when competitors enter into agreements that limit this independence of decision and restrict market operations, such as price-fixing agreements, restriction of production or quality control of products, or division of the market by customers, territories, products or purchases. You should never agree with any competitor on any of these topics, as such agreements will potentially be illegal.

Illegal agreements do not need to be in writing or even express mutual commitments or guarantees. Agreements can be based on loose talk, informal discussions, or the mere exchange of information between competitors that may result in price fixing or other agreement. Any communication with a competitor's representative, however innocuous it may seem at the time, may later be subject to judicial scrutiny and constitute the basis for accusations of improper or illegal conduct. To avoid undue agreements, our Group prohibits:

- ◆ Conversations/contacts with competitors about prices, costs or terms and conditions of sale;
- ◆ Conversations/contacts with suppliers and customers that unfairly restrict market operations or exclude competitors from the market;
- ◆ Agreements with competitors relating to the allocation of markets or customers;
- ◆ Agreements with others for boycotting customers or suppliers; and any abuse of
- ◆ the Company's market position.

5.2.2 Collection of information about the Company's competitors

It is perfectly legitimate for the Group to collect information about the market, including information about its competitors and their products and services. However, there are limits to how such information can be obtained and used. When collecting competitive information, the following guidelines must be observed:

- ◆ Gather information about the Company's competitors from sources such as published articles, advertisements, and magazines, other non-proprietary materials, consultant surveys, and conversations with the Company's customers.

- ◆ Never attempt to obtain a competitor's trade secrets or other proprietary information through illegal means, such as theft, spying, bribery, or violation of a competitor's non-disclosure agreement.
- ◆ If there is any indication that the party possessing the information has not obtained it lawfully, it must refuse it. If you receive any competitive information anonymously or that is marked as confidential, you should not review it and should immediately contact the Legal Department.

6. OUR WORKING RELATIONS

6.1 Respect, integrity, loyalty and team spirit

The relationship between employees must be based on mutual respect, loyalty and justice, in compliance with the principles of ethics and cooperation, contributing to a good work and team environment. Everyone who works for the Group must contribute to the creation and maintenance of an environment in which all employees feel respected and valued. Managers and team leaders have a special responsibility to promote a work environment that promotes honesty, integrity, respect and trust.

You must demonstrate tolerance and respect for diverse cultures, opinions and lifestyles different from your own, always considering how your behavior may affect others.

The adoption of any discriminatory, intimidating, harassing or physical/psychological aggression in the workplace is prohibited. Bullying in the workplace is unacceptable conduct by an employee towards other employees that may lead to the limitation of rights or intimidation of that employee. Demanding compliance with best production practices is not considered intimidation.

6.2 Protection of personal data and employee privacy

It is the duty of our Group to guarantee the right to privacy of its public interest and its employees, as well as the confidentiality of personal and sensitive data to which it has access, guaranteeing wide accessibility to its holder, adequate storage, right of consultation and correction of data and its use only for the purposes appropriate to the effective operations of the Group and allowed by law.

Employees responsible for maintaining personal data and those who have been given access to said information must not disclose it or make use of it for a purpose other than that established by the Company, under penalty of violating the applicable legislation or the privacy protection policy. Group's personal data. Access to personal records should be limited to personnel who have the proper authorization and a clear functional need to access such information.

For questions or information related to LGPD (General Data Protection Law), please contact our DPO via email dpo@ecbsa.com.br.

6.3 Equality of opportunity and non-discrimination

Our Group is an equal opportunity employer in its hiring and promotion practices, benefits and salaries.

Our Group does not tolerate any discrimination against anyone based on race, religion, color, age, marital status, national origin, sexual orientation, citizenship, or for any other reason prohibited by law, whether in recruitment, hiring, placement, promotion, or any other employment status, or any other conduct that creates or promotes an offensive or hostile work environment.

Everyone is entitled to equal opportunities and impartial treatment based on merit.

6.4 Harassment

Our Group strictly prohibits any form of harassment in the workplace, including sexual and moral harassment. The Company will take immediate and appropriate steps to prevent and, where appropriate, punish behavior that constitutes any harassing practice.

When the employee is embarrassed by a practice that he or she considers harassment, of any kind, must report it through the reporting channel.

To enable the investigation of this type of complaint, it is essential that the communication is carried out immediately so that the Company can take the appropriate measures in the case.

6.4.1 Sexual Harassment

Verbal, visual, or physical conduct of a sexual nature that can be characterized as sexual harassment is unacceptable in the workplace.

Examples include:

- ◆ Sexual advances, sexually explicit language, comments about another employee's body or sexual activities;
- ◆ Showing sexually suggestive objects, photos or gestures;
- ◆ Solicit sexual favors in exchange for work, promotion, salary increase or any other benefit;
- ◆ Inappropriate physical contact without the other's consent and naughty invitations; etc.

6.4.2 Moral Harassment

Under the terms of this Code, moral harassment is verbal or physical conduct that denigrates or demonstrates hostility or hatred towards individuals because of their race, color, nationality, citizenship, religion, sexual orientation, marital status, age, physical or mental disability, disability or any other characteristic that:

- ◆ Has the purpose or effect of creating a hostile or offensive work environment, considered by all workers;
- ◆ Consists of the use of derogatory insults or negative stereotypes;
- ◆ Consists of adopting intimidating acts, such as *bullying* or moral and physical threats; or has the
- ◆ purpose or effect of adversely interfering with an individual's work performance.

Any conduct, in addition to those constituting moral or physical harassment, that constitutes abuse of power is also prohibited.

6.5 Workplace safety

Employees' health, safety, and protection are vital to our Group. The Group complies with all rules relating to occupational safety and hygiene in the workplace, with the aim of promoting a responsible work culture, concerned with health, safety, and prevention of occupational risks. The employee is personally responsible for maintaining the facilities without recognized risks and for respecting hygiene, health, and safety rules. Workplaces must be kept clean and orderly in order to encourage efficient operations and the promotion of good safety practices.

Employees are obliged to comply with occupational safety requirements and fire protection rules, in accordance with applicable legislation and the Group's internal policies and procedures.

If you become aware of any condition that is dangerous to health or safety, you must report it to the Occupational Safety Department.

6.5.1 Drugs and alcohol

Except at Company approved events, possession or being under the influence of alcohol on Company premises is prohibited.

The employee must be aware that he represents the Company when he is present at company events, traveling for work reasons, or attending other corporate events. Unacceptable behavior resulting from excessive alcohol consumption may be treated as disciplinary offenses where appropriate.

It is prohibited to appear at the workplace under the influence of drugs or alcohol. During the work period or during the operation of the Company's equipment or vehicles, as well as on its premises during breaks, it is prohibited to use, transfer, sell, manufacture or possess drugs or associated belongings, alcohol, or other substances that produce an effect similar. If you are using any medication that causes a safety risk, you should immediately report it to your manager.

6.6 Training

Our Group adopts a training plan that aims to provide its employees with guided and continuous training, in the technical and behavioral areas, which allows them to maximize their skills and motivation and consolidate the standards of excellence.

Employees receive specific training on *compliance*, involving ethical conduct, anti-bribery, and corruption with mandatory attendance.

Employees must continually seek to improve their knowledge and develop their skills, in order to achieve excellence in the performance of their duties and contribute to the provision of better services to the Group, aiming at total customer satisfaction.

6.7 Communication

Our Group seeks active involvement, initiatives, and consultations with its employees in order to facilitate communication and dialogue between employees and managers. It also provides communication channels to maintain an open dialogue between all interested parties, such as communities, class entities, etc.

6.8 Innovation

Our Group promotes the use of technology and enhances innovation in its business areas, in order to maximize exploration, promoting and encouraging the emergence of new ideas that add value. All the innovations promoted in the different works and branches of the Company must be communicated to the central services of the Company, in order to be duly registered in its database.

7. VIOLATIONS OF THE CODE

7.1 Responsibilities

Every employee is individually responsible for complying with the obligations set forth in this Code, the Group's internal procedures, policies, and current legislation. The conduct of every employee must be guided, in all circumstances, by the principles and values described herein. The Group has a number of resources and people available to answer your questions and guide you through difficult decisions.

Failure to comply with this Code may result in the financial and reputation loss of our Group, the application of criminal or civil sanctions or the liability, not only of the Group, but also of the employee.

7.2 Reporting channels and anti-retaliation policies

7.2.1 General considerations

The Group has channels for reporting any irregularity, which are available and can be used by anyone, internal or external to the Company.

Mechanisms and procedures for receiving, retaining, and handling reports of irregularities are carried out in accordance with current legislation and the Group's internal procedures.

Any person may report, in any circumstances, irregularities of a general, operational or financial nature and/or violations of this Code or the Group's policies to their immediate superior, the Ethics and *Compliance* Committee, the *Compliance* department, or through the reporting channel available on the Company website.

It is essential that the complaint is made with as much information and details as possible, to enable the investigation. Likewise, if any, documents proving the accusations must be made available, enabling the correct investigation and punishment of those responsible, such as receipts, emails, photos, contracts, etc.

The report may be made anonymously or identified. By choosing to identify yourself, identity is preserved and non-retaliation is guaranteed.

For more information on how the reporting and handling process works, see the procedure for reporting irregularities.

7.2.2 Company Compliance Helpline

The Group has a Helpline through which guidance can be requested or questions related to this Code or the Group's *Compliance* policies and procedures can be raised. Questions may be asked anonymously to the *Compliance* Helpline, however, your identification may speed up the Company's response time.

To contact the *Compliance* Helpline, send an email to the following address:
compliance@ecbsa.com.br

7.2.3 Whistleblower Channel

The Group also provides the ombudsman channel on its website, through which complaints can be made, anonymously or identified.

Website: <http://www.ecbsa.com.br/ouvidoria/>

Phone: 0800 591 0263 - available from Monday to Friday - from 9 a.m. to 5 p.m.

7.3 Disciplinary actions for infraction

Our Group makes all reasonable efforts to prevent the occurrence of conduct contrary to this Code, internal policies and procedures, and to prevent it, as soon as possible, as soon as it is discovered.

Without prejudice to specific additional training, any civil or criminal liability arising from the behavior in question, employees who violate this Code or any other Group policy or procedure are subject to appropriate disciplinary actions, from warning to dismissal for just cause, without prejudice to other sanctions provided for by law.

8. TERM OF CONSENT





ECB



TERM OF AGREEMENT CODE OF ETHICS AND BUSINESS CONDUCT

I declare for all due purposes that:

- i) I have full knowledge of the Code of Ethics and Conduct of **ECB** and Mota-Engil and I read, understand, accept and undertake to comply with it;
- ii) I am aware that this Code is part of my duties as an employee and should guide my daily conduct in the exercise of my activities, incorporating the rules provided for in the Individual Employment Agreement and other rules of conduct adopted by the Group;
- iii) I am aware that non-compliance with the provisions of the Code and other Group *Compliance* policies and procedures may result in the application of penalties, graded according to severity and reiteration.

Name:

CPF:

Position:

Branch/Work:

Date: / /

Signature:





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