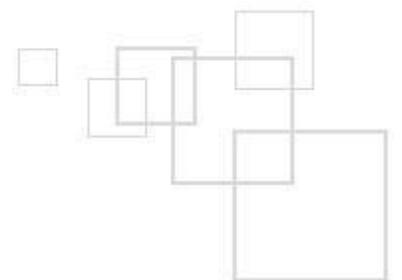


SUPPLIER CODE OF ETHICS AND BUSINESS CONDUCT





Datasheet

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Responsible Person: Ethics and *Compliance* Committee.
Approval: Board of Directors.
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Dear Supplier,

Service quality, respect for the environment, social responsibility, integrity, safety and health at work have always been part of ECB- Mota Engil's strategic management plan. And, as part of our commitment to positively influence our partners and foster a healthy environment in business relationships, we have created this Supplier Code of Ethics and Conduct.

We intend this Code to be more than a statement of what ECB-Mota Engil expects from its Suppliers. We hope it will contribute with guidelines for our Suppliers to raise their quality standards, improve their products and services, business relationships, and ultimately raise their business potential with our organization.

While ECB-Mota Engil recognizes that there are different legal and cultural environments in which Suppliers operate around the world, this Code establishes a framework that ECB-Mota Engil considers important for managing production, distribution and supply chain operations, including minimizing environmental adverse impacts, for a healthy and safe workplace, for the maintenance of fair and reasonable working practices and for the good quality of materials supplied.

Compliance with this Supplier Code of Ethics and Conduct is an important factor in the selection and evaluation of current and potential suppliers. Based on our Code of Ethics and Conduct, ethical and socio-environmental guidelines have been established for all of the Group's Suppliers. In the development and selection of suppliers, service providers and integrated partners, ECB-Mota Engil has preference for those that are socially responsible and committed to the causes of social and community transformation. We thus expect commitments and practices consistent with the following topics, in order to strengthen our mutual understanding of the best practices that should guide the commercial relationship between the parties.

Empresa Construtora Brasil SA | Mota-Engil Group

1. COMMITMENT TO ETHICS AND INTEGRITY

The ECB-Mota Engil group is committed to corporate integrity and to disseminating ethical principles and values throughout its value chain. Our suppliers and partners must, in the course of their activities with ECB-Mota Engil, follow honest and ethical conduct, complying with the applicable laws and regulations, as well as with the provisions of this Code and other policies set by the group.

We emphasize the importance of third parties, in case of outsourcing and partnerships, to ensure the integrity of their business partners, in order to identify any misconduct in accordance with the values and principles of this Code.

In the context of any business relationship with ECB-Mota Engil, no conduct and/or behavior that is not in accordance with the values set by the Group shall be tolerated.

We expect the commitment to the truthfulness of the information provided, such as the professional training of service providers, information related to the economic, fiscal and financial situation of the company, compliance with sustainable, reputational and judicial practices and information related to counter practices established in this Code, and other information for the clarification purpose, when requested.

2. PURPOSE

The purpose of this document is to establish guidelines on the existing business relations between the ECB-Mota Engil Procurement area with suppliers and service providers, as well as to establish the general sustainability and integrity criteria, used in an integrated manner in the procurement process for materials, services and equipment.

We emphasize that the choice and maintenance of suppliers contracted by ECB-Mota Engil are based exclusively on technical, financial, quality, socio-environmental, ethical criteria, and also on compliance with the actual legislation.

This code demonstrates ECB-Mota Engil's values in a practical way, supported by the legal norms and internal procedures set by the group.

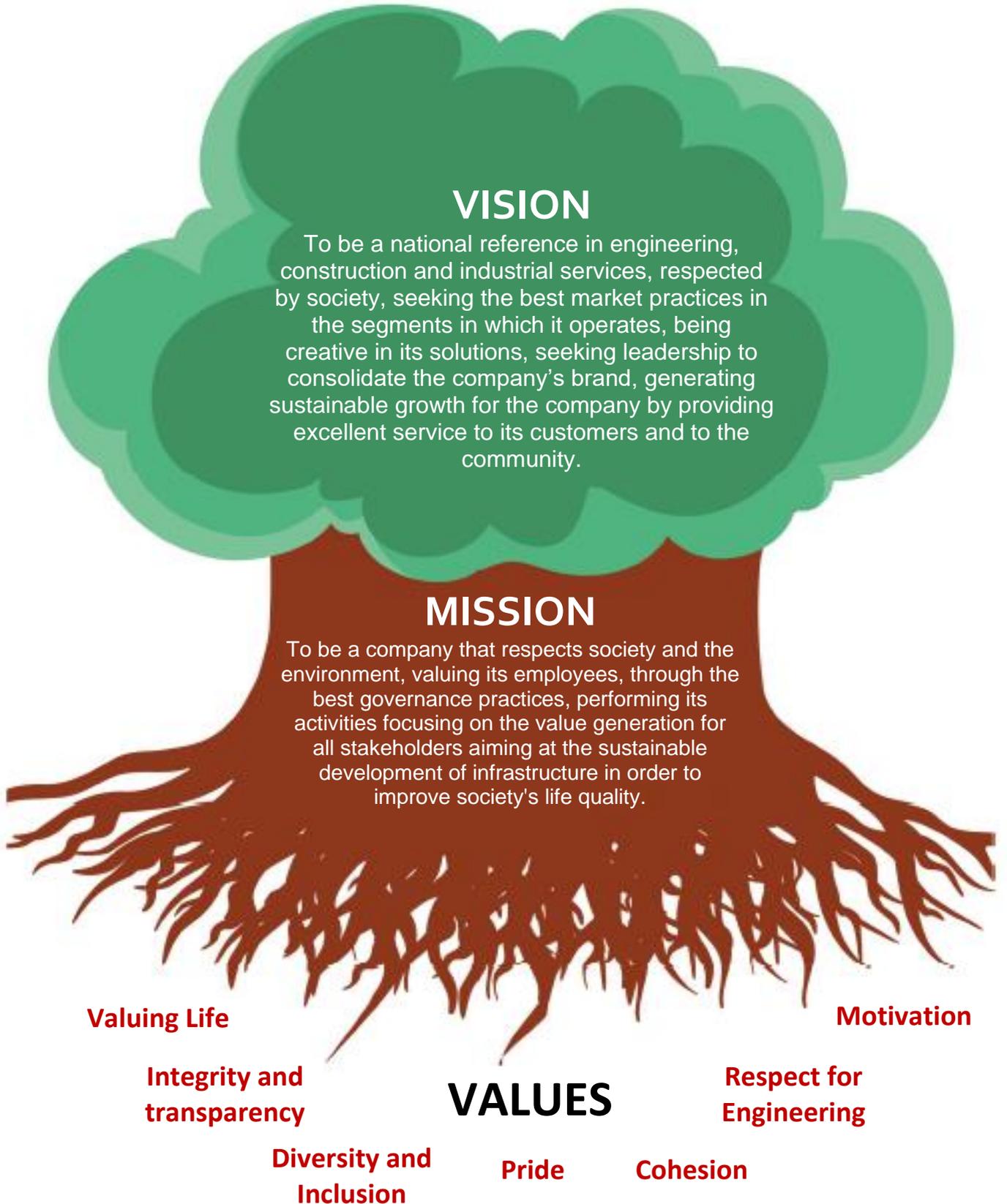
Use it to help in the case you are in doubt about how to act.

3. PROFILE, VISION, MISSION AND VALUES

Profile

Part of the Mota-Engil Group, ECB operates in different segments of engineering, notably in the road, railway and mining infrastructures construction, and also in civil, industrial and electromechanical construction throughout the country. Since 2018, it also operates in the oil and gas segment, through the maintenance of oil platforms, both *onshore* and *offshore*, committing themselves to its customers and *Stakeholders*, ensuring the technique and quality in its processes.

It is also concerned with environmental and labor safety issues, in order to perform its activities with solidity and responsibility.



4. SCOPE

This Code applies to all suppliers, vendors, contractors, consultants, agents and other providers of goods and services (collectively "Suppliers") who do business with ECB-Mota Engil, including its controlled and affiliated companies. Suppliers are also expected to multiply this information to the companies they hire.

5. OPERATIONAL MANAGEMENT

Good administration and operational management reflect financial benefits, which includes cost reduction associated with efficiency, reduced risk of fines, increased productivity, and reduced socio-environmental impacts.

ECB-Mota Engil conducts activities to continuously improve the performance of quality, environment, safety, and health at work, valuing the focus on discipline in its processes, quality control of its deliveries, innovation, and technical contribution to its operations.

The supplier self-assessment, qualification and evaluation process is an indicator implemented by ECB-Mota Engil to monitor and record the performance of contracted companies. Through it, the Supplier can seek improvements in the contractual execution and benefits for both parties.

In view of this, our Suppliers must be aware of the following standards:

- ✓ Meet the legal requirements for operation, such as environmental licenses and permits from city halls, among other applicable requirements.
- ✓ Maintain quality standards, environmental efficiency, and good practice programs throughout its entire production/service provisioning process, including effective follow-up for the issue of technical reports on aggregate tests, resistance and traceability.
- ✓ Pay attention to the traceability of concrete derived products, keeping records about their origin.
- ✓ Train its subcontractors with regard to productivity, product quality, and profitability, and guide them on good social, governance, environmental, and health and safety practices.
- ✓ Adopt practices of corruption/bribery prevention and compliance with the applicable legislation.

6. SUSTAINABILITY / SOCIAL RESPONSIBILITY

Ensuring respect for the fundamental rights of its employees and basic working conditions are some requirements considered mandatory for ECB-Mota Engil and, therefore, is expected from all Suppliers, thus avoiding the risk of sanctions, fines and labor lawsuits.

Within its sphere of action and influence, ECB-Mota Engil sets and supports some values, relating to the defense of human rights and working and environmental conditions, which follow the Ten Principles of the UN Global Compact.



1. Human Rights Protection.
2. Freedom of association and the right to collective bargaining.



3. Elimination of illegal work.
4. Eradication of child labor.
5. Fight against the sexual exploitation of children and teenagers.
6. Elimination of discrimination with respect to the employee and the position.



7. Preventive approach to environmental challenges.
8. Promotion of environmental responsibility.
9. Development and diffusion of clean technologies.



10. Combat corruption in all its forms.

In order to ensure compliance with these practices, Suppliers shall promptly ensure access to and make available information about their working conditions and facilities, in a broad and transparent manner, whenever requested by ECB-Mota Engil.

7. QUALITY

Suppliers must comply with all standards and legislation applicable to their product/service, meeting the requirements determined by ECB-Mota Engil, including committing to meet the applicable procedures and controls of the company and final customer.

All requested technical specification documentation must be delivered, in order to ensure proper traceability and to prove the conformity of your deliveries.

Employees who are to perform activities in the ECB-Mota Engil, agree to participate in the appropriate training, so that they can perform their activities in a correct and controlled manner, following the methodology described and always aiming for continuous improvement of their processes. They must also commit to taking care of the ECB- Mota Engil goods and products assigned for the performance of the work.

Suppliers must commit to the compliance and application of ECB-Mota Engil's SGI Policy and to contribute to the good performance of their supplies, paying attention to the necessary actions application for the adequacy of their process, on the need raised through Performance Evaluations and process monitoring, communicated by ECB-Mota Engil.

8. ENVIRONMENT

Suppliers must operate in an environmentally responsible and efficient manner and minimize environmental impact. Suppliers must commit to monitor their processes in order to have the least possible impact, because efficiency in the consumption of natural resources helps in rebuilding biodiversity and in the reduction of environmental impact caused by human activities.

Suppliers must:

- ✓ Commit to comply with the environmental legislation applicable to its products and services.
- ✓ Adapt waste management to legislation and classification standards, including type, storage, destination, and transportation.
- ✓ Comply with the conditions, as recommended by its environmental licenses and clearances and/or the competent authority.
- ✓ Be aware of the environmental aspects and impacts caused by its activities, products and services, and to program the necessary and sufficient control actions to keep them under control, not limiting itself only to comply with the actual legislation or norms.
- ✓ Control their atmospheric emissions in accordance with the limits established by law for particulates, greenhouse gases, and other gases; among other applicable measures.

9. HEALTH AND SAFETY

ECB-Mota Engil values the health and safety of individuals, regardless of their employment relationship, and always puts life first.

Suppliers are responsible for assuming the commitment to guarantee the physical integrity of each individual during the performance of their activities, being responsible for providing adequate means to ensure that the workplaces are protected against accidents and occupational diseases.

Suppliers must also mandatorily comply with all legal requirements, standards, and work health and safety procedures, in addition to adopting proactive measures to mitigate risks.

10. ESG

As a purpose of its strategic planning, ECB-Mota Engil adopts practices of environmental responsibility (*Environmental*), social responsibility (*Social*) and corporate governance (*Governance*), aiming to work toward sustainable purposes that go beyond the role of an organization to maximize profits.

In this sense, ECB-Mota Engil values and prioritizes Suppliers who follow these practices in their operations, seeking to minimize business impacts on the environment, to build a fairer and more responsible world, in addition to applying the best governance practices.

11. HUMAN RIGHTS

11.2. Working conditions

ECB-Mota Engil Suppliers must provide their employees with decent and healthy working conditions, complying with the actual legislation regarding working hours, minimum wage for the position, health, safety and all labor rights guaranteed.

11.3. Diversity (non-discrimination)

ECB-Mota Engil Suppliers shall respect differences in gender, ethnicity, political and religious beliefs, etc, so that discrimination based on these characteristics and race, color, age, class, sexual orientation, marital status, special needs, or any other type is forbidden. ECB-Mota Engil always values respect for others.

11.4. Child, forced and slave labor

ECB-Mota Engil will not enter into or maintain business relationships with Suppliers who use the illegal practice of child and adolescent labor, forced or slave labor, or who subject their employees to degrading conditions or conditions analogous to slave labor.

11.5. Harassment

Suppliers' workplace relations must be based on respect for the individual and human dignity. ECB-Mota Engil does not tolerate any conduct that can be characterized as sexual or moral harassment or any type of abuse.

Suppliers must treat everyone with whom they interact honestly, respectfully, and with dignity. No employee shall be subjected to corporal punishment, abuse of power, threats, violence, intimidation or harassment of any kind.

12. LABOR AND TAX OBLIGATIONS

Suppliers assume that they are the only employers of the workers used by them in the performance of their services and works, and must be in a regular situation regarding their labor, tax, social and ancillary obligations inherent in the employment relationship with their employees, being responsible for the due legal proof whenever requested by ECB-Mota Engil.

Strict compliance with the tax legislation must always guide the business conducted. Thus, Suppliers are responsible for informing ECB-Mota Engil of all taxes, contributions, tariffs and charges levied on the contracting, including those for which the responsibility collection is transferred to ECB-Mota Engil, and in the absence of adequate information, ECB-Mota Engil will comply with the tax obligations, according to the actual legislation.

13. ETHICS AND COMPLIANCE

Suppliers shall adopt ethical conduct, honesty, integrity, in line with the ethical standards of society and in strict compliance with the applicable laws when doing business with ECB-Mota Engil, third parties and the Government.

13.1. Code of Ethics

ECB-Mota Engil has a Code of Ethics and Business Conduct, which sets out the principles and values that must be observed by all, whose content is available on the ECB website www.ecbsa.com.br website and is mandatory reading.

13.2.1 Anti-Corruption and Bribery

ECB-Mota Engil has a zero-tolerance policy for acts of corruption. It is forbidden to practice any act harmful to the national or foreign Public Administration described in the Anticorruption Law (Law No. 12,846/13) or any other applicable legislation.

Suppliers and their agents are forbidden to offer, authorize, give, or promise any undue payment or advantage to public or private agents to influence decisions, conduct business or promote their own interests, those of ECB-Mota Engil or third parties.

In this sense, Suppliers must adopt measures to reduce these risks in order to comply with the actual anti-corruption and bribery legislation and related laws, in line with the best market practices.

Our Anti-Corruption and Bribery Policy is available on the ECB website www.ecbsa.com.br and the reading is mandatory.

13.2.2 Money Laundering and Terrorist Financing

ECB-Mota Engil condemns and does not tolerate money laundering, terrorism financing and any other illicit practices.

The Suppliers must keep practices of prevention, monitoring and fight against money laundering and terrorism financing, to be observed in the performance of their businesses and operational activities, ensuring integrity, transparency, conformity in their processes and protection against liability risks related to money laundering and terrorism financing.

To reduce the risks of money laundering and terrorism financing, ECB-Mota Engil sets procedures according to the activity and agents involved, such as accounting practices and administrative and financial management, which comply with the actual laws, rules and regulations, ensuring that its Financial Statements accurately and clearly reflect the transactions made by the Company; due diligence procedure prior to hiring; transactions in cash limited in value, etc.

13.3. Conflicts of interest

Throughout their relationship with ECB-Mota Engil, Suppliers shall avoid situations related to ethical, legal, financial, personal or other issues that may constitute possible conflicts of interest and ensure that their activities and interests do not conflict with their obligations and responsibilities to the Company.

If the Supplier becomes aware of any situation that may constitute a conflict of interest, the Supplier shall immediately inform ECB-Mota Engil.

13.4. Gifts, presents and hospitality

The offer or request of gifts, presents and hospitality to ECB-Mota Engil must follow the rules laid down in the respective internal procedure of the company, observing the requirements of value, periodicity, purpose, among others. So before you make any offer to one of our employees, please make sure it is in accordance with our procedure. Likewise, if you receive any offer that does not comply with our procedure, please report it through our reporting channels.

It is strictly forbidden to offer any item in exchange for favors in business with ECB-Mota Engil. If you receive any proposals from any of our employees, please report it through our reporting channel.

13.5. Third-party due diligence

ECB-Mota Engil performs the due diligence process for the previous evaluation of Suppliers, which aims to verify if they are acting in accordance with the values, rules, policies and internal procedures of the company, and the current legislation.

This includes an initial identification and assessment of the Third Party, including, but not limited to, the business sector it operates, the location of its operations, an assessment of its integrity, reputation, a knowledge of any past misconduct and of any known links to Politically Exposed Persons or Sanctioned Entities, in order to identify and reduce risks when hiring.

We strive to maintain the reputation of our organization, which is known for its integrity and compliance. Therefore, we also demand this of our Suppliers. Thus, sending the information requested in the *due diligence* process is a requirement for the beginning and maintenance of the commercial relationship with ECB-Mota Engil.

13.6. Whistleblower channel

ECB-Mota Engil has a whistleblower channel, through which all Suppliers and partners can report, in a secure and confidential manner, known violations or infractions of the Anti-corruption Laws and regulations established in this Code of Conduct.

The report can be made anonymously or identified, in two ways:

WEB: Canal Ouvidoria website www.ecbsa.com.br.

Phone: 0800 591 0263 - working from Monday to Friday - from 9am to 5pm.

We guarantee total confidentiality about the information provided through the report, which will be analyzed solely and exclusively by an independent team linked directly to ECB-Mota Engil's governance authority.

14. CONFIDENTIAL INFORMATION PROTECTION

Suppliers and their partners shall protect all confidential information with which they come into contact in the course of providing or performing services, and shall only use it appropriately for the purpose of contract performance. Suppliers and their partners shall protect the privacy and all valid intellectual property rights of all employees and business

partners.

15. PRIVACY AND DATA PROTECTION

Suppliers shall observe the provisions of the General Data Protection Law – LGPD (Law no. 13.709/2018) in business relations with ECB-Mota Engil, pledging to ensure the proper processing of personal data that they have access to during the contractual relationship, extending this obligation to its eventual employees and third parties, assuming the responsibility and consequences arising from its unauthorized disclosure or misuse, including in the civil and criminal spheres.

ECB-Mota Engil emphasizes that it only collects personal information that it needs to fulfill legal and commercial obligations, and only uses it for the proper purposes for which it is intended, observing all legal duties established in the LGPD.

It is of the utmost importance that all employees who may process or handle personal data are aware of the legal requirements set forth in the LGPD.

Any questions about how we handle your personal data should be directed to our DPO (*Data Protection Officer*) at dpo@ecbsa.com.br.

16. FINAL PROVISIONS

Our Group makes every effort to adopt best practices to ensure that business is conducted ethically, with integrity, transparency and legality, to prevent the occurrence of any counter conduct to this Code, procedures and its policies, and to stop such conduct as soon as it is discovered.

Full compliance with this code is a fundamental condition for the company to remain in the ECB-Mota Engil Supplier team.

Third parties who violate this Code or any other Group policy are subject to appropriate disciplinary action, which may range from termination of any business relationship with ECB-Mota Engil to blocking their registration in our database, without prejudice to applicable legal and liability actions.

We count on everyone's support to continue working within the highest standards of quality and compliance.



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