

# SAFETY, HEALTH, ENVIRONMENT AND QUALITY POLICY (SHEQ)

*Mota-Engil Group*



*Date: 21/07/2025 | REV 01*



# SAFETY, HEALTH, ENVIRONMENT AND QUALITY POLICY (SHEQ)

MOTA-ENGIL GROUP

Date: 21.07.2025 | Rev 01

## INDEX

1.	SHEQ COMMON COMMITMENTS .....	4
2.	PRODUCT AND SERVICE QUALITY COMMITMENTS .....	8
3.	SAFETY, HEALTH AND WELL-BEING COMMITMENTS.....	9
4.	ENVIRONMENTAL COMMITMENTS.....	10

Revision	Date	Motive Revision	Prepared by	Verification	Approved
01	21/07/2025	Update based on requirements of sustainability directives, strategic stakeholders and best practices	José da Silva Almeida	Top Management Committee	Board of Directors Mota-Engil

This revision box must be completed in each revision of this document.

ME-SGPS-IS-FTP-169-REV1

The purpose of this Policy is **to promote the integration of Mota-Engil's Management System**, the prevention and reduction of incidents, the well-being of employees, environmental protection and the excellence of services and projects, based on the following principles:

- Applicable to all business units, companies and contracts and their value chains;
- Integration of health and safety, environment and quality (SHEQ) management systems;
- Alignment with the Mota-Engil Group's Purpose, Values and Strategic Plan;
- Response to Requirements:
  - Applicable legal requirements;
  - Standards and regulations: ISO 9001, ISO 14001, ISO 45001 and CSRD
  - Applicable contracts;
  - External (*e.g., IFC Performance Standards on Environmental and Social Sustainability and IFC Environmental, Health, and Safety (EHS) Guidelines*).
- Action in the field of Sustainability;
- Efficiency of the organization.

This policy is composed of **common letters of commitment and dedicated to each of the areas**, Safety, Health, Environment and Quality (SHEQ) in order to guide and enhance action.

Each of the **guidelines should be implemented directly** or if **specification is needed, Procedures/Instructions for its implementation should be developed**.

Mechanisms should be created **to link the Variable Remuneration of Management and Employees**, in the event of non-compliance with the provisions of this SHEQ Policy.

The **definitions in this Policy** can be found in [IT MEans \(link\)](#) and are in *italics*.

## 1. SHEQ COMMON COMMITMENTS

- 1.1. **IMPLEMENT AND STANDARDIZE THE INTEGRATED MANAGEMENT SYSTEM, BASED ON THE GROUP'S PURPOSE AND RESPECTIVE STRATEGIC PLAN.** The strategic plan must take into account the **RISKS, OPPORTUNITIES AND IMPACTS AND RESPECTIVE MATERIAL TOPICS** identified in the double materiality and the involvement of stakeholders;
- 1.2. **IDENTIFY THE VALUE CHAINS** by Mota-Engil's business areas, including the respective **STAKEHOLDERS, AND ENHANCE:**
  - 1.2.1. **IDENTIFICATION OF VULNERABLE GROUPS** potentially impacted by the company's activities, including communities in situations of social or economic vulnerability, workers in inadequate conditions or populations at risk due to climate change, in order to develop specific actions that ensure their equitable access to opportunities, protection against adverse impacts and effective participation in decision-making processes; in accordance with legal requirements, international standards and the principles of non-discrimination, inclusion and proportionate remedy;
  - 1.2.2. **CONSULTATION AND ACTIVE AND SYSTEMATIC PARTICIPATION** of the various stakeholders in order to identify their needs and expectations and enhance action;
  - 1.2.3. **THE IDENTIFICATION OF IMPACTS, RISKS AND OPPORTUNITIES**, based on the double materiality methodology, with a special focus on climate change, in order to identify material topics and integrate them into the Mota-Engil group's strategy, its management and action plans;
  - 1.2.4. **RELATIONSHIPS BASED ON TRUST, TRANSPARENCY AND MUTUAL RESPECT**, in line with the Code of Ethics and Business Conduct and whenever necessary, fair and proportionate remediation measures must be implemented;
  - 1.2.5. **THE DEFINITION AND COMMUNICATION OF SUPPLY CHAIN REQUIREMENTS, INCLUDING PROCESSES, PRODUCTS, SERVICES, REQUIRED SKILLS, AND PERFORMANCE CONTROL.** Communication can be made through documents, such as contracts and specifications. Periodic updating of specifications and documentation of interactions are essential to demonstrate compliance with requirements;
  - 1.2.6. **THE SELECTION AND EVALUATION OF SUPPLIERS AND SUBCONTRACTORS**, ensuring that 1) they comply with mota-engil's management system, 2) they analyze their impacts, risks and opportunities, 3) they report deviations, 4) they implement treatment actions (mitigation and prevention), 5) they promote and implement operation control systems, inspections and conformity assessment;
  - 1.2.7. **THE GUARANTEE OF STAKEHOLDER SATISFACTION**, with a special focus on the customer, through the systematic monitoring of their satisfaction in order to improve processes, products and services, as well as to respond effectively to complaints.

- 1.3. Define and communicate **OBJECTIVES, GOALS AND INDICATORS**, with special focus on "**LEADING INDICATORS**" focused on **SAFETY AND HEALTH OF WORKERS, ENVIRONMENTAL IMPACTS, PRODUCT AND SERVICE QUALITY and MANAGEMENT SYSTEM EFFECTIVENESS** and:
  - 1.3.1. Be aligned with the **GROUP'S STRATEGIC PLAN** and its priorities.
  - 1.3.2. Be **COMMUNICATED TO ALL WORKERS AND THE SUPPLY CHAIN**
  - 1.3.3. Have **ASSOCIATED ACTIONS** in order to achieve the respective goals;
  - 1.3.4. Ensure **CONTINUOUS PERFORMANCE MONITORING** in the management and operation meetings of the respective levels, promoting continuous improvement actions;
- 1.4. **The INTEGRATED MANAGEMENT SYSTEM OF THE MOTA-ENGIL GROUP should be structured BY STRATEGIC, SUPPORT AND OPERATIONAL PROCESSES**, with the definition of the respective **PROCESS OWNERS** both at the level of the Mota-Engil Group and at the level of the Business Units and respective companies;
- 1.5. Ensure that **TOP MANAGEMENT, PROCESS OWNERS AND ALL MANAGEMENT POSITIONS, LEAD BY EXAMPLE**, through active participation in the definition and implementation of actions, thus promoting a SHEQ culture based on **GOOD PRACTICES AND CONTINUOUS IMPROVEMENT**;
- 1.6. **THE SHEQ AREA MUST REPORT DIRECTLY TO TOP MANAGEMENT**, AT ALL ORGANIZATIONAL LEVELS, IN ORDER TO ENSURE IMPARTIALITY AND INDEPENDENCE OF ACTION. The **SHEQ TEAM MUST BE SIZED** in order to ensure the effective implementation of the integrated management system, based on international best practices;
- 1.7. The **STRATEGIC PROCESSES SHOULD DEFINE TRANSVERSAL GUIDELINES TO ALL BUSINESS AREAS, RESPECTIVE COMPANIES AND CONTRACTS** based on policies, procedures and instructions, which should be adjusted and complemented by the Business Units, respective companies and contracts based on the local context (namely legal, contractual or regulatory requirements)
- 1.8. Define, implement and strengthen awareness of the "**GOLDEN RULES**", which aim to guarantee the **MINIMUM CONDITIONS OF SAFETY, HEALTH, ENVIRONMENT AND QUALITY** for all workers (internal and external), supply chain and all those who are under its control;
- 1.9. **ENSURE THAT MANAGEMENT AND OPERATION ARE BASED ON AN IMPACT, RISK AND OPPORTUNITY ASSESSMENT (IRO) METHODOLOGY**, associated with material topics, hazards, climate change and aligned with internal and external entities. This assessment should be carried out 1) processes considered strategic by the Group, 2) in all business units of the Group and respective companies, 3) in contracts in order to **DEFINE PREVENTION AND MITIGATION ACTIONS, MEASURE THEIR IMPACT** and contribute to **CONTINUOUS IMPROVEMENT**, throughout the value chain and its *strategic stakeholders*;
- 1.10. Define, at an operational level based on risks, opportunities and impacts, **METHODOLOGIES INTEGRATED INTO THE GROUP'S STRATEGIC PROCESSES**, through **PLANS, OPERATIONAL PROCEDURES, WORK INSTRUCTIONS AND INSPECTION AND/OR TESTING PLANS** adapted to the specificities of business units, companies and contracts, in order to 1) ensure compliance with internal and external requirements; 2) optimize the efficiency

and quality of products/services; 3) the efficiency of the activities of safety, health and well-being of workers and 4) protection of the planet;

- 1.11. **COMMUNICATE THE POLICIES AND OTHER DOCUMENTS CONSIDERED STRATEGIC FOR THE MOTA-ENGIL GROUP**, internally to all employees and externally to the supply chain and other *stakeholders*, through efficient and proactive means of communication;
- 1.12. **MONITOR AND MEASURE PERFORMANCE**, ensuring that the chosen methods result in valid data and in compliance with requirements, with a special focus on assessing legal compliance;
- 1.13. Implement **INTEGRATED INTERNAL AUDIT PROGRAM** (*due diligence SHEQ*) at the various levels of the Organization, namely Corporate, Companies and Contracts and Supply Chain, also considering mergers and acquisitions, in order to promote the verification of Mota-Engil's management system;
  - 1.13.1. Ensure the existence of an **INTERNAL AUDITORS POOL**, with the necessary competence, representing the Strategic Processes, various business units and geographies in order to promote the sharing of knowledge between auditors and auditees and the increase in the efficiency of the Group's integrated system;
- 1.14. **IMPLEMENT SHEQ COMMITTEES AT THE VARIOUS LEVELS OF THE ORGANIZATION**, namely corporate, business units, companies and contracts, which are led by the top management of the respective level and recorded in minutes, in order to 1) increase the efficiency of the SHEQ process, 2) ensure the consultation, participation and involvement of all workers and communities (whenever applicable) 3) promote improvement;
- 1.15. **STANDARDIZE THE BASIC CONCEPTS, COLLECTION AND REPORTING METHODOLOGIES**, associated with safety and health, environment and quality in all the group's business units, taking into account the specificities of the local context:
  - 1.15.1. **THE REPORTING OF STRATEGIC AND SUPPORT PROCESSES IS THE RESPONSIBILITY OF THE RESPECTIVE PROCESS OWNERS**;
  - 1.15.2. In the case of **PERFORMANCE REPORTING**, it must be **VALIDATED BY THE RESPECTIVE MANAGEMENT** of the corporate Strategic Processes, contracts, companies, and business units, respectively, aiming at a uniform, timely, rigorous, traceable and transparent flow of information;
- 1.16. Clearly define the **RESPONSIBILITIES AND COMPETENCIES OF EACH FUNCTION IN THE RESPECTIVE PROCESSES**, through the job description and consistent with the integrated management system. Ensure **the COMPETENCIES PREVIOUSLY DEFINED IN THE RECRUITMENT PROCESS**. Ensure **that COMMUNICATION OF FUNCTIONS TO EMPLOYEES AND THAT THEY UNDERSTAND THEM**. Continuously promote the **ACCOUNTABILITY AND APPRECIATION** of employees, in alignment with the organization's strategic objectives. SHEQ employees must have the necessary **TECHNICAL SKILLS IN ORDER TO PERFORM THEIR DUTIES** with rigor and effectiveness.
- 1.17. Promote the **DISSEMINATION OF ORGANIZATIONAL AND TECHNICAL KNOWLEDGE** to workers and the supply chain and third parties (whenever applicable), through an **ORGANIZED TRAINING PLANNING** and **AWARENESS AND AWARENESS CAMPAIGNS IN THE VARIOUS AREAS OF THE PROCESSES** (include the target audience,

mandatory themes, training responsibilities and implementation schedule). The Corporate area, the Business Units and companies must **ENHANCE THE STANDARDIZATION OF TRAINING CONTENT** in order to reinforce the Mota-Engil culture. All **TRAINING MUST BE REGISTERED** in *Success Factors* or other applicable registration systems. THE **EFFECTIVENESS OF TRAINING** should be evaluated. It should also be noted that in the planning of training you should:

- 1.17.1. Ensure the mandatory performance of the **SHEQ INDUCTION**, to all internal and external employees (including subcontractors, service providers, visitors, among others), regardless of training promoted by the client, ensuring the identification and mitigation of all risks associated with the operation, in accordance with the applicable standards and requirements. This induction reinforces the commitment to Safety, Health, Environment and Quality, promoting a culture of prevention and continuous improvement.
- 1.17.2. As a complement to local training, implement the **TOOL BOX TALK, DAILY BEFORE THE START OF WORK**, given by the Manager or Operational Supervisor, in all operations, in order to identify and communicate the risks of operational activities/tasks and respective mitigation measures and share lessons learned
- 1.17.3. **SHEQ MOMENTS**, to be held at management and operation meetings, or other internal and external events, duly recorded, with a special focus on safety, in order to strengthen awareness of SHEQ topics, including lessons learned and good practices.
- 1.18. **PRESERVE, CENTRALIZE AND RAISE THE QUALITY OF THE DOCUMENTED INFORMATION** and respective reporting, in all processes;
- 1.19. **PROMOTE THE DIGITALIZATION OF PROCESSES AT THE VARIOUS LEVELS OF THE ORGANIZATION**, INCLUDING reporting, using technologies and artificial intelligence, in order to 1) increase efficiency, 2) ensure accuracy, 3) traceability and 4) formal validation of management, 5) reduce bureaucracy, and 6) facilitate decision-making;
- 1.20. Ensure the **REGISTRATION AND TREATMENT OF THE CAUSES OF ALL NON-CONFORMITIES and OPPORTUNITIES FOR IMPROVEMENT** detected internally and externally in the various processes that make up the Management system;
- 1.21. Implement and digitize the **INCIDENT REGISTRATION AND INVESTIGATION PROCEDURE**, in order to 1) ensure the registration and reporting of incidents, 2) standardize the investigation method based on internationally recognized methods, 3) identify the existence of negligence, 4) define mitigation measures and 5) report internally and externally. A **MULTIDISCIPLINARY INVESTIGATION COMMITTEE** should also be defined, according to the level of severity of the incident in order to ensure a neutral and suitable investigation in order to **COMMUNICATE AND INVOLVE TOP MANAGEMENT IN THE LESSONS LEARNED**;
- 1.22. Implement the **SAFETY, HEALTH AND ENVIRONMENT EMERGENCY PROCEDURE**, in collaboration with the various departments, based on scenarios, in order to prepare support and mitigation actions for the respective emergency scenarios. **PERIODIC DRILLS SHOULD ALSO BE PROMOTED** for the various Scenarios;
- 1.23. **PROMOTE THE CONTINUOUS IMPROVEMENT OF PROCESSES**, based on reporting, internal audits, self-assessment, inspections, good practices, ESG requirements, *benchmarking*, innovation and adoption of technology and lessons learned, ensuring that the system is not supported only by Contractual requirements;

- 1.24. Implement mechanisms for **RECOGNITION OF BEHAVIORS AND GOOD PERFORMANCE AND COMMITMENT** and ensure **ACCOUNTABILITY IN CASE OF NON-COMPLIANCE**, WITH SPECIAL EMPHASIS ON THE GOLDEN RULES;
- 1.25. **PROMOTE MANAGEMENT REVIEWS**, conducted by top management, to ensure that systems remain effective, aligned with strategic objectives and compliant with standards. the resulting decisions and actions will be documented and continuous improvements will be implemented.
- 1.26. **PLAN THE CHANGE**, assess the respective risks and opportunities, ensure that it is aligned with the Group's strategy and objectives and keep the information documented;
- 1.27. Ensure the **CERTIFICATIONS OF THE INTEGRATED MANAGEMENT SYSTEM**, in the areas considered strategic, through the validation of an external entity, internationally recognized;

## 2. PRODUCT AND SERVICE QUALITY COMMITMENTS

- 2.1. **CAREFULLY DETERMINE THE REQUIREMENTS OF PRODUCTS AND SERVICES** – including any relevant changes – and **ENSURE THEIR FEASIBILITY BEFORE MAKING COMMITMENTS, ENSURING FULL COMPLIANCE WITH THE REQUIREMENTS OF CUSTOMERS AND OTHER STAKEHOLDERS**. Promote **CONTINUOUS SATISFACTION THROUGH CLEAR COMMUNICATION AND RIGOROUS EVALUATION OF ALL CHANGES**, in order to fully meet the established needs and expectations;
- 2.2. **CONTROL THE INPUTS AND OUTPUTS OF THE DESIGN**, ENSURING 1) EVALUATION OF INPUT REQUIREMENTS, 2) control of revisions, 3) approvals and 4) accuracy and adequacy of data and information, 5) verification of design results ensuring compliance with specifications and customer expectations and 6) documented information; (where applicable)
- 2.3. Ensure **SYSTEMATIC QUALITY PLANNING, FROM CONCEPTION TO DELIVERY**, ensuring the control and traceability of processes, resources and acceptance criteria, promote compliance and minimize variations according to defined requirements;
- 2.4. Whenever applicable, implement at the operational level and communicate the **QUALITY MANAGEMENT PLAN OF THE MOTA-ENGIL GROUP**, duly adjusted to the context of each business unit in all contracts, **ensuring its consistent and effective application**, as well as **ensuring clear**, transparent and continuous communication with customers and other *stakeholders*;
- 2.5. Ensure that all **PRODUCTION (Operation) ACTIVITIES AND SERVICE PROVISION MUST TAKE PLACE IN CONTROLLED ENVIRONMENTS, WITH EFFECTIVE CONTROL OF PROCESSES, RESOURCES AND ACCEPTANCE CRITERIA**;
- 2.6. Ensure that the results obtained are feasible and that the equipment used to obtain them are properly controlled through **MONITORING AND MEASUREMENT PROCEDURES OF RESULTS**;



- 2.7. **Establish and execute activities of MONITORING, "IN SITU" INSPECTION AND TESTS AT CRITICAL POINTS OF PROCESSES, PRODUCTS AND SERVICES**, in order to verify compliance with the established requirements. These activities will be carried out by management, the SHEQ team and all employees with relevant functions, **AIMING AT THE PREVENTION OF NON-CONFORMITIES, PROCESS FAILURES AND CRITICAL QUALITY INCIDENTS**;
- 2.8. **ENSURE THAT ALL PRODUCTS AND SERVICES MEET THE ACCEPTANCE CRITERIA ESTABLISHED BEFORE THEIR DELIVERY TO THE CUSTOMER (exit processes)**, ensuring compliance with applicable requirements, ensuring traceability and maintaining proper documented evidence of verification and authorization of release;
- 2.9. **IDENTIFY, CONTROL AND TREAT ALL NON-COMPLIANT OUTPUTS** in order to prevent their misuse or delivery, ensuring the traceability of the actions taken, including authorizations and derogations, based on the severity and risks involved;
- 2.10. **IDENTIFY, PROTECT AND SAFEGUARD THE PROPERTY OF CUSTOMERS AND EXTERNAL SUPPLIERS WHILE UNDER THEIR CONTROL OR BEING USED**, ensuring their proper use and reporting occurrences of loss, damage or inadequacy;
- 2.11. **ENSURE THE PRODUCTION AND SUPPLY OF PRODUCTS AND SERVICES UNDER PLANNED AND CONTROLLED CONDITIONS**, ensuring compliance with specified requirements, including post-delivery activities;
- 2.12. **PRESERVE THE INTEGRITY OF PRODUCTS AND SERVICES AT ALL STAGES**, ensuring compliance with applicable requirements and preventing their deterioration, loss, misplacement, contamination or obsolescence, based on planned provisions supported by documented information.
- 2.13. **ANALYZE, PLAN AND IMPLEMENT, WHERE APPLICABLE, POST-DELIVERY ACTIVITIES**, ensuring compliance with legal and contractual requirements and customer needs, as well as the prevention of unintended consequences associated with products and services.

### 3. SAFETY, HEALTH AND WELL-BEING COMMITMENTS

- 3.1. Promote a **CULTURE OF SAFETY, HEALTH AND WELL-BEING**, based on the integrated management system and **BEHAVIOR**, enhancing a **proactive attitude to prevent dangerous situations, unsafe acts, occupational diseases** (physical and mental) and **risk mitigation** with the **INVOLVEMENT OF THE RESPECTIVE VALUE CHAINS AND COMMUNITIES**, including suppliers, service providers and subcontractors;
- 3.2. Promote **ACTIVE LEADERSHIP**, with a special focus on **TOP AND OPERATIONAL MANAGEMENT - Visible Felt Leadership (VFL)** in the participation in prevention, awareness and supervision actions of safety and physical and mental health aspects;
- 3.3. Promote **HAZARD ASSESSMENT METHODOLOGIES, RISKS** (including psychosocial and chemical risks) **AND OPPORTUNITIES IN THE FIELD OF SAFETY, HEALTH AND WELL-BEING** (physical and mental) **FOR ALL OPERATIONAL ACTIVITIES**, INCLUDING NON-ROUTINE ONES, WITH **PRIOR COMMUNICATION TO THE OPERATIONAL TEAMS OF THE HAZARDS** and the respective **MITIGATION MEASURES, BEFORE THE START OF THE WORK**;

- 3.4. Ensure that the **PROCESS OWNERS OF ALL MANAGEMENT SYSTEM PROCESSES** are responsible and identify the **SAFETY AND HEALTH HAZARDS AND RISKS ASSOCIATED WITH THEIR ACTIVITIES, and PROMOTE THE IMPLEMENTATION OF MITIGATION AND PREVENTION MEASURES**, reinforcing the safety culture in all areas of activity of the Mota-Engil Group;
- 3.5. Implement **WORK PERMITS** associated with **HIGH RISK ACTIVITIES**;
- 3.6. Promote the **IMPLEMENTATION OF PREVENTION TECHNOLOGIES BOTH IN EQUIPMENT AND IN ACTIVITIES** in order to mitigate the risk at source;
- 3.7. Ensure the **DEFINITION AND IMPLEMENTATION OF INDIVIDUAL AND COLLECTIVE PROTECTION** in order to mitigate the risks of the activities and ensure that all workers (internal and external) are equipped with them;
- 3.8. Ensure the standardization and implementation of **ADMISSION, PERIODIC, OCCASIONAL AND DISMISSAL MEDICAL EXAMINATIONS** with the intuitive aim of ensuring that the employee is fit to carry out the activities, based on the respective risks associated with each activity in the respective business area, even if the law does not require it, thus promoting the consequent monitoring of their health (physical and mental);
- 3.9. Enhance **MENTAL and PHYSICAL HEALTH** based on 1) increased literacy, 2) risk assessment (including psychosocial), 3) **internal PSYCHOLOGICAL SUPPORT FOR WORKERS** , and 4) well-being actions;
- 3.10. Promote **ACTIVE SAFETY SUPERVISION "IN SITU"** led by the **OPERATIONAL MANAGEMENT TEAMS and SHEQ TEAMS** and with the **PARTICIPATION OF ALL EMPLOYEES** (internal and external).
- 3.11. **IDENTIFY AND RECORD DANGEROUS SITUATIONS, UNSAFE ACTS AND INCIDENTS** (including *near misses*), in order to identify the respective **CAUSES and TRENDS**, and define the respective **MITIGATION MEASURES**

## 4. ENVIRONMENTAL COMMITMENTS

- 4.1. **IDENTIFY ELIGIBLE ACTIVITIES and ENHANCE their ALIGNMENT**, based on the requirements of the **EU TAXONOMY**, based on internal and value chain information;
- 4.2. **DETERMINE THE ENVIRONMENTAL ASPECTS**, INCLUDING SIGNIFICANT ONES, ADVERSE ENVIRONMENTAL IMPACTS (risks) and **BENEFICIAL ENVIRONMENTAL IMPACTS** (opportunities), considering the life cycle perspective, in all business units of the Group and their respective companies, in order to **DEFINE MITIGATION AND PREVENTION ACTIONS, MEASURE THEIR IMPACT** and contribute to continuous improvement;
- 4.3. If applicable, promote the existence of **ENVIRONMENTAL IMPACT STUDIES**, prepared by certified entities, in projects/contracts in order to identify environmental aspects and respective impacts in order to define mitigation actions;
- 4.4. **DEFINE AND PLAN RESOURCES**, namely equipment, products and services, taking into account the impacts they cause during their life cycle;
- 4.5. **ENHANCE THE INCLUSION OF ENVIRONMENTAL REQUIREMENTS in the DESIGN AND DEVELOPMENT OF PRODUCTS AND SERVICES** at each stage of their **LIFE CYCLE**;

- 4.6. **INCLUDE ENVIRONMENTAL CRITERIA** in the selection and evaluation of suppliers and subcontractors and **DETERMINE AND CLEARLY COMMUNICATE** to suppliers and subcontractors the **ENVIRONMENTAL REQUIREMENTS** of the Mota-Engil Group;
- 4.7. **PROMOTE ENVIRONMENTAL PRACTICES ALONG THE VALUE CHAIN**, with a special focus on the supply chain, and ensure that it acts in accordance with the internal requirements of the Mota-Engil group and all others that are applicable;
- 4.8. Whenever applicable, implement and communicate the **MOTA-ENGIL GROUP'S ENVIRONMENTAL MANAGEMENT PLAN**, including the Waste Management Plan, duly adjusted to the context of each Business Unit in all contracts, **ensuring its consistent and effective application, as well as ensuring clear, transparent and continuous communication with customers and other stakeholders**;
- 4.9. **PROMOTE ACTIVE IN SITU SUPERVISION OF THE ENVIRONMENT**, promoted by local top management, management/supervision of the operation, the SHEQ team and all elements with relevant functions, in order to prevent and mitigate the environmental impacts associated with activities, in operations, throughout the value chain and in the community, including suppliers and subcontractors, and define mitigation and prevention actions, acting in the prevention of environmental incidents;
- 4.10. **PREVENT, MITIGATE AND COMPENSATE ADVERSE ENVIRONMENTAL IMPACTS resulting from EMERGENCY SITUATIONS and PREPARE** to act, if necessary, by conducting drills; training; periodic testing of response procedures, with a view to continuous improvement;
- 4.11. Develop a climate target **ALIGNED WITH SCIENCE** and with the best reporting references.

## 4.12. Commitment to Climate Change

- 4.12.1. **CONSIDER THE RISKS AND OPPORTUNITIES ASSOCIATED WITH CLIMATE CHANGE** and implement mitigation measures;
- 4.12.2. **PROMOTE THE IMPROVEMENT OF THE CALCULATION OF DIRECT AND INDIRECT GREENHOUSE GAS (GHG) EMISSIONS**, with a focus on contracts and identify contracts with emissions greater than 25k tons CO<sub>2</sub>eq/year, and **ADOPT A TRANSPARENT POSTURE IN THE INTERNAL AND EXTERNAL REPORTING OF THE CARBON FOOTPRINT AND MITIGATION ACTIONS**;
- 4.12.3. Promote the reduction of the carbon footprint of operations throughout the value chain, **MITIGATING, OFFSETTING OR EXCLUDING ACTIVITIES AND PROJECTS WITH GREATER CARBON INTENSITY OR GREATER CLIMATE RISK**;
- 4.12.4. Promote **ENERGY EFFICIENCY AND THE TRANSITION FROM ENERGY CONSUMPTION** derived from fossil sources to energy consumption derived from renewable sources, giving preference to electricity suppliers with a higher percentage of renewable energy and **RENEWABLE ENERGY AUTONOMY SOLUTIONS**;
- 4.12.5. Promote the **CONSUMPTION AND/OR ACQUISITION OF MATERIALS WITH LOWER GHG EMISSION INTENSITY**;
- 4.12.6. Improve the Group's processes based on the **STRATEGIC OBJECTIVES FOR REDUCING GHG EMISSIONS**.

## 4.13. Commitment to the Use of Resources and the Circular Economy

- 4.13.1. **MANAGE THE GENERATION OF WASTE** through practices of **REUSE, REPAIR, RECONVERSION, REMANUFACTURING AND REORIENTATION** to the detriment of its treatment, including the promotion of environmental innovation in the use of new technologies;
- 4.13.2. Ensure that the principle of **WASTE HIERARCHY** is respected in operations and throughout the value chain: a) prevention; b) preparation for reuse; c) recycling; d) other types of valorization and e) elimination;
- 4.13.3. Ensure that **all WASTE SENT FOR TREATMENT IS PROPERLY TREATED, THROUGH THE SELECTION OF CERTIFIED WASTE MANAGEMENT OPERATORS;**
- 4.13.4. Ensure that all waste, including **Construction and Demolition Waste (CDW)**, is **identified, classified and reported internally** in accordance with MOTA-ENGIL's guidelines, and local legal requirements must also be complied with;
- 4.13.5. **PROMOTE ECO-DESIGN**, through the development of durable, easily repairable products that, at the end of their **life cycle**, can be considered waste as a resource;
- 4.13.6. Promote the **CONSUMPTION AND/OR ACQUISITION OF RECYCLABLE MATERIALS OR MATERIALS THAT INCORPORATE A PERCENTAGE OF RECYCLED;**
- 4.13.7. To improve the group's processes aimed at **INCREASING THE RECOVERY OF WASTE.**

## 4.14. Commitment to Biodiversity and Ecosystems

- 4.14.1. Promote the **INVOLVEMENT OF STAKEHOLDERS**, including affected communities, in the **SCOPE OF BIODIVERSITY AND ECOSYSTEMS**, in a transparent manner and in line with internationally recognized references, **CONDUCTING AND MONITORING A HIERARCHY OF MITIGATION OF THE IMPACTS CAUSED;**
- 4.14.2. Encourage the **IDENTIFICATION, EVALUATION AND EXCLUSION OF SUPPLIERS AND SUBCONTRACTORS**, WHOSE ACTIVITIES AND PRODUCTION AREAS **PUT CRITICAL OR NATURAL HABITATS AT RISK;**
- 4.14.3. Enhance the **ASSESSMENT AND REDUCTION OF NEGATIVE IMPACTS ON BIODIVERSITY AND ECOSYSTEMS**, WHICH CANNOT BE AVOIDED, THROUGH **PRESERVATION AND PROTECTION MEASURES**, with a special focus on endangered species, critical habitats and privileging native species, avoiding the introduction of exotic species, among others;
- 4.14.4. In all contracts, whenever possible, **AVOID DEFORESTATION AND THE REMOVAL OF NATIVE SHRUB, TREE AND HERBACEOUS SPECIES, PROTECTING AS MUCH AS POSSIBLE THE ECOSYSTEMS AND HABITATS PREVIOUSLY EXISTING ON THE LAND**, except when and in areas where it is imperatively necessary, in accordance with the respective work permits and work plans, and promote **ecological restoration** actions throughout the value chain;
- 4.14.5. Strengthen measures for **the PREVENTION AND MITIGATION OF IMPACTS ON BIODIVERSITY AND ECOSYSTEMS**, in projects/contracts that impact protected areas or areas with a high biodiversity index.

## 4.15. Commitment to Water and Marine Resources

- 4.15.1. Promote in its own operations and throughout the value chain the **PROTECTION AND PRESERVATION OF WATER AND MARINE RESOURCES**, especially in areas of high water stress, including efficiency measures and reuse and recycling practices, which allow the long-term protection of available water resources;
- 4.15.2. Promote the **PREVENTION, CONTROL AND REDUCTION OF POLLUTION** with a special focus on the waters resulting from operations and selective separation and routing of hazardous waste, through the implementation of practices that allow its treatment prior to its discharge, in accordance with the applicable environmental standards, and monitoring of water quality;
- 4.15.3. Wherever possible, ensure **SUSTAINABLE ACCESS TO WATER to LOCAL COMMUNITIES**, ensuring that operations do not compromise its availability, especially in vulnerable regions.