



GRUPO MOTAENGIL

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SUPPLIER CODE OF ETHICS AND CONDUCT

Approved on 15.07.2024

Mota-Engil Group Culture

Purpose and Objectives

The Mota-Engil Group (understood as Mota-Engil, SGPS, S.A. and its subsidiaries and branches) is distinguished by its commitment, its people and its competences, highlighting its **purpose** ("Our Legacy inspires and commits us to build a better world") which culminates in its capacity for action on the road to a more sustainable future. The Mota-Engil Group is guided by **ambition, integrity, cohesion and a group spirit** that favours continuous improvement, honesty, joint effort and a culturally respectful working environment, aiming for a proud legacy and a promising future.

The Mota-Engil Group is committed to the highest standards of ethical, legal, environmental and social responsibility.

Our suppliers play a key role in realising these objectives, and sharing ethical values and sustainable practices in full compliance with the laws applicable in the markets where we operate are the cornerstones of these relationships.

The dissemination of these standards throughout the supply chain is crucial to guaranteeing efficiency, quality and compliance throughout the process.

The social and environmental standards and practices described here are based on the Ten Principles of the United Nations Global Pact, the International Bill of Human Rights, the International Labour Organisation ("ILO") Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Reference should also be made to the Model Law of the United Nations Commission on International Trade Law on Public

Procurement due to the Mota-Engil Group's commitment to the principles of transparency, efficiency, and integrity in its procurement operations. The inclusion of this reference is intended to help align the practices of Suppliers with recognised international standards, promoting a culture of responsibility and good practices.



"Supplier" is any individual or entity that directly provides goods or services to Mota-Engil Group companies, including its subsidiaries, affiliates, subcontractors and its own Suppliers. This definition is consistent throughout the document, unless otherwise specified.

Social Awareness

Human Rights

Our Suppliers are committed to maintaining a strict policy that actively protects internationally recognised human rights. The United Nations Guiding Principles on Business and Human Rights form the basis for this objective. This includes the protection of local communities, indigenous peoples, and human rights defenders.

Fair Labour Conditions

Our Suppliers undertake to enforce the right to fair labour conditions in accordance with applicable ILO conventions. This includes working hours, fair wages and social benefits at or above the rates prescribed by national or regional authorities, legal regulations or other labour agreements. The legal provisions on minimum wages in the respective countries must be observed along with the applicable regulations on working hours, breaks and holiday entitlement. Our suppliers must at least comply with local labour legislation.

Child Labour

Our Suppliers undertake not to hire people who have not reached the minimum legal working age, not to tolerate any form of child labour, and to observe and respect the dignity and rights of children. ILO Conventions 138 on the minimum age for admission to employment and 182 on the prohibition and immediate action for the elimination of the worst forms of child labour must be respected.

Forced Labour

Our Suppliers undertake to strictly reject any form of forced or involuntary labour, which includes, but is not limited to, human trafficking, slavery or compulsory labour of any kind. The principle of free

choice of employment must be respected and observed, and the conditions of employment must be freely agreed. The confiscation of personal identification documents, passports or work permits as a condition of employment must be rejected.

Freedom of Association

Our Suppliers must defend the right of workers to freedom of association and collective bargaining, which must not constitute grounds for unjustified discrimination. The right to collective bargaining for the resolution of disputes concerning working conditions and the right to strike are granted within the framework of legal provisions and in accordance with ILO Convention 98.

Gender Equality, Diversity in the Workplace and Non-Discrimination

Our Suppliers undertake not to accept discrimination of any kind, whether based on skin colour, ethnic origin, gender, age, nationality, social origin, disability, sexual orientation, religious affiliation, human ideology or political or trade union activity, or any other. The same applies to any form of harassment. Given comparable requirements and tasks, the principle of equal pay for work of equal value, regardless of gender, applies. ILO conventions must be respected.

Occupational Health and Safety

As a minimum, our Suppliers must comply with national workplace safety and hygiene standards and take appropriate measures to fulfil occupational health and safety requirements to ensure healthy working conditions. In addition, our Suppliers who are also manufacturers must consider adopting an occupational health and safety (OSH) management system in accordance with ISO 45001

or an OSH management system appropriate to the industry and take appropriate measures to achieve the objectives of an OSH management system.

Protection Against Expropriation and Land Deprivation

Our Suppliers undertake to refrain from any illegal expropriation. They must also refrain from any illegal deprivation of land, forests and waters through the acquisition, development, or other misuse thereof.

Use of Private or Public Security Forces

Our Suppliers undertake not to hire or use private or public security personnel if, due to a lack of instruction or control by the Supplier, there is a risk of violating the prohibition of cruel, inhuman, or degrading treatment, of endangering life or physical integrity or of violating freedom of association.

Local Talent

The Mota-Engil Group favours local partnerships and expects its Suppliers to share the same concerns, guaranteeing equal opportunities and reducing unequal results by eliminating discriminatory practices and ensuring access to local partnerships.

Commitment to the Environment

Environmental Protection

We expect our suppliers to be committed to making every effort to (i) minimise risks to people and the environment (ii) protect natural resources by avoiding pollution and (iii) mitigate the impacts of pollution when it cannot be avoided. All processes, operating sites and means of production used by our Suppliers must comply with applicable legal requirements and environmental protection standards. Our Suppliers, who are also manufacturers, undertake to adopt and develop an environmental management system (EMS) in accordance with ISO 14001 or an environmental management system appropriate to the industry.

Climate Action

Our Suppliers must recognise the climate change emergency and commit to targets. We expect our Suppliers to engage in persistent and active climate action, for example by increasing energy efficiency, producing, or procuring energy from renewable sources. They must provide a transparent overview of their carbon emissions and set ambitious targets for reducing them, in line with the Paris Agreement.

Biodiversity

We expect our Suppliers to strive to reinforce actions for the proactive preservation of ecosystems and to contribute to the protection of biodiversity in order to ensure that no irreversible impacts are caused and to minimise impacts on biodiversity, for example by acting in the conservation of endangered species and the preservation of natural habitats, the promotion of sustainable forest management and nature conservation, in a transparent manner and in line with internationally recognised benchmarks.

Hazardous Substances

We expect our Suppliers to manage hazardous substances in such a way as to comply with international and local regulations at all operational stages, including engineering, production, import, transport, storage, use, recycling, and disposal.

Water Consumption and Quality

Our Suppliers undertake to use water with due care. In regions where water is scarce, they must minimise water abstraction and provide access to drinking water and sanitation. Wastewater quality standards must be defined and monitored within the scope and framework of applicable legal and regulatory requirements.

Air and Soil Quality

As a minimum, our Suppliers must comply with the applicable legal provisions and the requirements of the local authorities.

Materials and Waste Disposal

We expect our Suppliers to minimise any impact their operations may have on the environment and to use resources sparingly. Materials should be reused wherever possible, and the development of circular products should also be promoted with a view to minimising the use of virgin materials. When dealing with waste, our Suppliers should follow the principle of first avoiding waste, then recycling it and finally disposing of it as a last resort. As a minimum, our suppliers must comply with the applicable legal provisions and the requirements of the competent authorities in these matters.

Prohibited Chemical Substances

Our Suppliers are obliged to comply with material compliance rules, namely legal substance bans, complying among others with the ban on the production and use of certain chemicals defined in the Stockholm Convention on Persistent Organic Pollutants and the ban on the export of hazardous waste in accordance with the Basel Convention.



Business Relations/ Ethics

Gifts and Hospitality

Our Suppliers are prohibited from offering or accepting gifts of cash or cash equivalents to/from Mota-Engil Group associates, and at all times, gifts and hospitalities arising from business (clearly linked to a legitimate business purpose) must comply with Mota-Engil Group policies, work orders and procedures and applicable local laws, and items offered to third parties must be limited in value, and every effort must be made to ensure that the symbolic value of the gift outweighs its monetary value.

Conflict of Interest

We expect our Suppliers to make decisions based on objective considerations and not to be unduly guided by personal interests or the influence of third parties. When a situation of potential conflict of interest is detected, the Supplier must take measures to resolve the conflicts and notify Mota-Engil Group immediately.

Anti-Corruption and Bribery, Prevention of Money Laundering and Terrorist Financing

Mota-Engil Group has adopted a zero-tolerance policy towards acts of corruption, bribery, money laundering and terrorist financing, and prohibits such acts in any form, either directly or through third parties, namely our Suppliers, anywhere in the world. The offer or acceptance of bribes of any kind is not tolerable anywhere the Mota-Engil Group operates. Suppliers must refrain from any act that could constitute a violation of anti-corruption, bribery, prevention of money laundering and terrorist financing rules, and must adopt reasonable measures to prevent such acts.

Conflict Zones

We expect our Suppliers to desist and abstain from all activities that contribute, directly or indirectly, to the financing of armed groups by complying with legal and reporting obligations.

Free Competition

Our Suppliers are obliged to comply with all applicable legal regulations in this area, and must refrain from entering into agreements, concerted practices, and decisions by associations of undertakings which have as their object or result the prevention, distortion or restriction of competition as defined by antitrust laws, or the abuse of a dominant position in the market. Suppliers must refrain from engaging in any other illegal or unethical practice and must follow fair commercial practices. Whenever the Mota-Engil Group requests information regarding the applicability of sanctions, it must be provided.

Data Privacy and Security

Our Suppliers undertake to respect the right to informational self-determination, the privacy of personal data and the security and confidentiality of all commercial information and personal data in all commercial processes, in accordance with applicable legislation on privacy, confidentiality and information security.

Customs and Export Control Regulations

Our Suppliers undertake to comply with international customs and export control regulations and to proactively share information related to foreign trade in the interests of a secure supply chain.

Protection of Assets

Our Suppliers must guarantee respect for the assets of the Mota-Engil Group and its stakeholders, and their use must only occur when and under the terms duly authorised.

Economic Dependence

Our Suppliers must actively seek to minimise the risks associated with significant economic dependence (as well as that of their Suppliers) to ensure long-term prosperity and sustainability.

Fiscal Integrity

The Mota-Engil Group maintains a correct tax policy, aligned with the legislation of the places where it operates, and expects its Suppliers to fulfil the same purpose.

Management

Mutual Efficiency

As a Supplier you must be committed to customer satisfaction, guaranteeing high quality products and services, with agile processes to identify and understand the customer's legal requirements.

Supplier Selection

In its Supplier evaluation and selection process, the Mota-Engil Group considers three dimensions: Integrity (and compliance with applicable laws), Financial and ESG, ensuring a transparent and fair acquisition or integration process.

Monitoring Supplier Performance

The Mota-Engil Group has a Supplier evaluation process throughout the supply chain, adopting specific criteria such as responsiveness and adaptation, quality of work, post-receipt assistance, compliance with deadlines, environmental and risk prevention concerns, technical capacity, relationship with the structure and financial performance, among others. At the end of the assessment cycle, Suppliers will be informed, according to defined criteria, to develop action plans focusing on the continuous improvement of the process, demonstrating the Mota-Engil Group's commitment to participating in the sustainable development of its business partners. As a Supplier, you must have an equivalent process for selecting and evaluating Suppliers to mitigate the risk in terms of legal, environmental, health and safety, labour practices and ethics compliance. This involves assessing the importance of each risk and applying appropriate measures to manage those risks and maintain regulatory compliance.



Commitment to Quality

Mota-Engil Group aims to prioritise the supply of high-quality products and services that meet the applicable contractual, regulatory and legal conditions, as explained in Mota-Engil Group's SHEQ Policy, generating value for customers and communities, and we therefore expect our Suppliers to be guided by the same principles.

Compliance with The Code of Ethics and Conduct

Compliance Checks

To ensure long-term prosperity and sustainability, the Supplier must carry out regular self-assessments of its compliance with this code, as well as immediately report any deviations or challenges in adherence to these principles and promptly collaborate with the Mota-Engil Group in audit and review initiatives, when requested. The Supplier must also respond to enquiries and requests for information within a reasonable timeframe and in accordance with the formalities specified by the applicable data protection laws.

Consequences of Offences

Any breach of the obligations described in this Code of Ethics and Conduct constitutes a breach of the contract with Mota-Engil Group. The Supplier must, within a reasonable period, inform Mota-Engil Group of the internal corporate measures adopted to avoid future breaches. In cases where it does not fulfil these obligations or does not take the appropriate corrective measures within a reasonable time, or if the breach of the Code of Ethics and Conduct is so serious that it is unreasonable to expect Mota-Engil Group to maintain the business relationship, Mota-Engil Group reserves

the right - without prejudice to any other rights - to terminate the relationship without prior notice and to terminate any associated contracts or agreements.

Ethics Channel

All Suppliers, collaborators and affected parties are encouraged to report suspected cases and violations of this Code of Ethics and Conduct. Such reporting will serve to mitigate the consequences of such violations and prevent future misconduct of the same nature. To this end, Suppliers must set up their own whistleblowing systems or join a system that covers the entire sector (in accordance with Law no. 93/2021, which established the general regime for the protection of whistleblowers). The Mota-Engil Group provides the Ethics Channel as an exclusive and confidential mechanism for the safe communication of irregularities or misconduct, which can be accessed via the Mota-Engil Group website or directly via [the link](#). Our Suppliers should inform their employees about this reporting option.



Acceptance

Acknowledgement of the Supplier's Code of Ethics and Conduct

I, as "Supplier", undertake to adhere to this Code of Ethics and Conduct, which will take precedence in all transactions with Mota-Engil Group entities.

This commitment is valid if adherence to this Code of Ethics and Conduct does not conflict with any local laws or regulations.

Compliance with the principles of this Code of Ethics and Conduct is essential and a decisive factor for the continuity of the relationship between the Mota-Engil Group and its Suppliers. Mota-Engil Group reserves the right to amend the Code of Ethics and Conduct at any time to accommodate legislative changes or other relevant adjustments, ensuring that the Code remains effective and relevant.

The Mota-Engil Group reserves the right to select and evaluate Suppliers and, if there is any violation of this Code, it will give the Supplier the opportunity to remedy or develop improvement actions, or ultimately terminate the relationship with it.

You can consult the full text of the Mota-Engil Group's Code of Ethics and Business Conduct and all the information on the Integrity and Compliance Programme at [this link](#).

Supplier Name

Supplier Signature

Date____/____/____



MOTÆNGIL

A world of inspiration

