



ANTI- HARASSMENT AND DISCRIMINATION POLICY

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Document Datasheet

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Historical		
Version	Approval Date	Changes
4.1	06-12-2021	Original version
4.2	16-06-2025	Update on: • Change in the functional area responsible for managing the Ethics Channel, resulting from the transfer of management from the Internal Audit Department to the Corporate Compliance Department; • Change in the attributions of the Harassment and Discrimination Committee; • Elimination of the reference to the Internal Audit Department, due to the latest organizational changes; • Update of the Informal Complaints Mechanism; • Introduction of the link to the existing app for the Informal Complaints Mechanism;
4.3	30-06-2026	Clarification on the interplay with local legal requirements and specific structures for the prevention and management of reporting harassment, and discrimination matters within Group entities.

The Mota-Engil Group is governed by a Policy of monitoring and continuous improvement of its Policies and Procedures. Thus, the information contained in this Policy is subject to updating, and Mota-Engil reserves the right to update it, whenever necessary.

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1. INTRODUCTION

1.1 The Mota-Engil Group is committed to promoting a workplace free of harassment, discrimination and intimidation, where all employees can work with the principles of trust and respect for differences, in a dignified, respectful and inclusive environment.

1.2 Thus, employees must act in accordance with the high ethical standards of honesty and integrity articulated in the Mota-Engil Group's Code of Ethics and Business Conduct, as well as other applicable principles and rules.

1.3 Employees are expected to treat each other with courtesy and respect, and should always avoid, in the workplace, behaviors that may create an environment of hostility, discrimination or intimidation.

1.4 This applies to all interactions, whether with supervisors, peers, or subordinates; and in all work situations, regardless of whether they take place directly in the workplace or in the context of work-related activities, e.g. at company events or trainings.

1.5 Any act of discrimination, such as discriminating in the offer of employment opportunities, benefits or privileges, constitutes a violation of this Policy; creating discriminatory working conditions; or to use discriminatory standards of appraisal at work if the basis of such treatment is, in whole or in part, discriminatory on the grounds of gender, race, colour, ethnicity or social origin, genetic features, language, religion or belief, political affiliation or any other affiliation, membership of a minority, interests, place of birth, disability, age or sexual orientation.

1.6 The Mota-Engil Group prohibits any type of harassment, including sexual harassment, and will take appropriate and immediate measures in response to complaints or knowledge of violations of this Policy.

1.7 Employees should be aware that all forms of harassment and discrimination may constitute misconduct and may be grounds for disciplinary action, including dismissal with cause.

2. DEFINITIONS AND EXAMPLES

2.1 The multicultural composition of the Mota-Engil Group and the socio-economic differences of the markets where we are present, add a special challenge in understanding what constitutes discrimination and harassment, since behaviors that may be considered acceptable in one culture may be offensive in another. Thus, we must always behave according to the highest standards, regardless of what may be considered culturally acceptable, wherever we are present.

2.2 In their interactions, it is important that all employees act with tolerance, sensitivity and respect for cultural differences.

DISCRIMINATION

2.3 Discrimination refers to any form of unequal treatment by words or actions in relation to the grounds listed in point 1.5, regardless of whether those actions would lead to additional burdens or benefits. It may involve direct action, or it may involve defining rules, practices, or procedures that appear to be neutral but have the effect of discriminating against certain employees or groups.

2.4 Discrimination can occur:

- (a) Directly, when a person or group of people is treated less favorably than another person or group of people due to a personal characteristic; or
- (b) Indirectly, when an unreasonable requirement, condition or practice has, or is likely to have, the effect of harming persons with a particular personal characteristic.

2.5 Behaviors that may constitute discrimination include, but are not limited to:

- (a) An employee is humiliated because of his or her race or background;
- (b) An employee is refused promotion because he or she is "too old";
- (c) The termination of the employment relationship is decided based on the identification of the people who have filed claims for compensation for work and not for their demerit;
- (d) Uttering racially motivated jokes and humor;
- (e) Do not allow employees free time to participate in religious or cultural ceremonies;
- (f) Not providing adequate sanitary facilities for employees, particularly women;
- (g) Systematically exclude employees from minority groups from promotion opportunities;
- (h) Denying women in the workplace regular tasks comparable to those of their male counterparts.

HARASSMENT

2.6 Harassment is unwelcome verbal or nonverbal behavior that unduly interferes with work or creates an intimidating, hostile, or offensive work environment.

2.7 Verbal harassment includes offensive or unwanted comments regarding your country of origin, race, color, religion, age, sex, sexual orientation, pregnancy, appearance, disability, gender identity or expression, marital or other similar status, including the use of negative epithets, slurs, and stereotypes.

2.8 Nonverbal harassment includes the distribution, display, or discussion of any written or graphic material that ridicules, denigrates, insults, disparages, or displays hostility, dislike, or disrespect toward an individual or group on the grounds of country of origin, race, color, sexual orientation, pregnancy, appearance, disability, gender identity or expression, marital status, or otherwise.

2.9 Behaviors that may constitute harassment include, but are not limited to:

- (a) Public or private speeches by a supervisor or colleague;
- (b) Repeated insults or comments related to a person's personal or professional competence;
- (c) Threatening or insulting comments, oral or written, including those made by all types of electronic means;
- (d) Deliberate desecration of religious and/or national symbols;
- (e) Racial epithets, slurs, and malicious and negative stereotypes expressed to an individual or a group of individuals, directly or indirectly (e.g., circulated via e-mail, written on walls);
- (f) Malicious and dishonest complaints against other collaborators.

SEXUAL HARASSMENT

2.10 Sexual harassment is a specific form of harassment that deserves particular attention due to its serious effects on impacted individuals and the Group.

2.11 Sexual harassment is any unwanted sexual advance, request for a sexual favor, or other verbal, nonverbal, or physical conduct of a sexual nature that alters or becomes a condition of employment, or that creates an intimidating, hostile, or offensive environment.

2.12 Verbal sexual harassment includes innuendo, suggestive comments, sexual jokes, sexual proposals, lewd comments, and threats; requests for any kind of sexual favor (this includes repeated and unwanted requests for dates); and verbal abuse of "banter" that is geared toward a prohibitive form of harassment, including that which is sexual and unwanted in nature.

2.13 Nonverbal sexual harassment includes the distribution, display, or discussion of any written or graphic material, including calendars, posters, and cartoons that are sexually

suggestive or show hostility toward an individual or group due to sex; suggestive or insulting sounds; malicious staring; staring; whistling; obscene gestures; content in letters, notes, pictures, emails, photographs, text messages, *tweets*, and messages on the internet; or other forms of communication of a sexual and offensive nature.

2.14 Physical sexual harassment includes unwanted physical contact, including touching, tickling, pinching, groping, rubbing, hugging, cornering, kissing, fondling, and is not limited to forced sexual intercourse and assault.

2.15 Behaviors that may constitute harassment include, but are not limited to:

- (a) A direct or implied request, or an offer of sexual favors in exchange for favorable professional treatment;
- (b) The repetition of suggestive comments or insinuations;
- (c) The display of materials of a sexual nature (e.g. display of pornography on the internet, websites or screensavers);
- (d) The use of rude or obscene language or gestures, or the telling of rude or obscene jokes;
- (e) Repeated and/or exaggerated compliments about a colleague's personal appearance;
- (f) Invitations to social activities if there is persistence after the recipient has made it clear that they are not welcome;
- (g) Deliberate and unsolicited physical contact, or unwanted physical proximity.

DISCRIMINATION AND HARASSMENT COUNSELOR (DHC)

2.16 The function of the DHC must be performed by the Human Resources manager within the Group company.

2.17 When the location of a project is physically and/or organizationally distant from the central offices of the Group company, the SHEQ person responsible for that project will act as DHC's delegate for the employees working at that location.

2.18 When two or more companies in the Group share the same premises, they may have a common and unique DHC.

2.19 The list of DHCs is available at the usual internal information locations and accessible through the link, as per Annex 2 to this Policy, and may be amended whenever necessary.

3. RESPONSIBILITIES

3.1 This Policy applies to everyone, including:

- (a) Employees; and
- (b) All companies, subsidiaries, branches, delegations and representative offices of the Mota-Engil Group.

3.2 The Group expects all its business partners to respect the Principle of Equality between women and men and not to tolerate discriminatory or harassing behaviour.

3.3 The prevention, cessation and reporting of any discriminatory behaviour or harassment is the responsibility of everyone, including each and every employee and all those who work for us or under our control.

3.4 Employees must ensure that they have read, understood and will comply with this Policy, and must raise any concerns they may have with the Discrimination and Harassment Advisor (DHC) of the Group company or the project or with Mota-Engil's Corporate Compliance Department¹.

3.5 The **governing bodies of each Group company** are responsible for ensuring that all persons under their control are aware of and understand this Policy and that employees receive regular and appropriate training on it.

3.6 The **Discrimination and Harassment Counselor (DHC)** will be responsible for:

- (a) Provide means of assistance that allow an employee who is a victim of discrimination and/or harassment to communicate with the person who offends him or her in an open, honest and safe manner;
- (b) Work closely with an employee who is experiencing discrimination and/or harassment and their managers to seek an active resolution;
- (c) Propose remediation actions focused on stopping the behavior, preventing recurrence through active supervision, and protecting affected parties;
- (d) Support the management team and the Corporate Compliance Department in addressing situations of inappropriate behavior;
- (e) Bridge the gap for employees who seek support to escalate the complaint, from the informal process to its handling by the Corporate Compliance Department;
- (f) Inform an employee who is a victim of discrimination and/or harassment about the

¹ compliance@mota-engil.com

psychological and health support available;

- (g) Serve as a central point of contact with the Corporate Compliance Department to review allegations of discrimination and harassment and assist the investigation team when necessary (e.g., where informal complaint process has exhausted); and
- (h) Register incidents using the Discrimination and Harassment Incidents registration application, as per Annex 3.

3.7 The **SHEQ Manager of the Group/project company** will be responsible for:

- (a) Promote a safe and healthy workplace, both psychologically and physically, for all employees;
- (b) Develop guidance on how best to support employees affected by discrimination and/or harassment;
- (c) Provide support to victims of discrimination and/or harassment related to their physical and mental health and psychosocial well-being;
- (i) Serve as a central point of contact with the Corporate Compliance Department to review allegations of discrimination and harassment and assist the investigation team when necessary (e.g., where the means of informal complaint process have been exhausted).

3.8 The **Corporate Human Resources Department** will be responsible for:

- (a) To support the DHC of the Group company and, in conjunction with the Corporate Compliance Department, to provide it with special training that allows it to provide assistance to victims of discrimination and harassment;
- (b) Ensure a consistent approach to all allegations of discrimination and harassment and facilitate DHC support to the individual;
- (c) Provide victims of discrimination and harassment with guidance, advice and support on career/professional matters;

and for being part **of the Harassment and Discrimination Commission²** as a member.

3.9 The **Corporate Compliance Department** will be responsible for:

² Without prejudice to the provisions of this Policy, and taking into account the specific legal and regulatory requirements applicable in certain markets, some Group entities may be required to comply with the provisions of the applicable local legislation regarding the handling of reports and/or to establish specific bodies or committees for the prevention, assessment, and management of harassment and discrimination situations. In such cases, these structures shall, whenever possible, act in accordance with the principles and guidelines set out in this Policy, ensuring its full implementation and consistency.

- (a) The implementation and control of the use and effectiveness of this Policy;
 - (b) To send to the Harassment and Discrimination Commission any complaint originating from the Ethics Channel and that falls into the category of incidents of discrimination and harassment;
 - (c) Ensure that the process of complaints referred to the **Harassment and Discrimination Commission** complies with laws and regulations and the Reporting of Irregularities and Non-Retaliation Policy, namely with regard to confidentiality, rights of the whistleblower and of the reported parties;
 - (d) Conduct the formal process of investigation of complaints;
 - (e) Engage an independent third party to conduct an investigation, if necessary; and
- for being part **of the Harassment and Discrimination Commission as a** member.

3.10 The **Corporate Legal Department** is a member **of the Harassment and Discrimination Commission**.

3.11 The **Group's Chief Corporate Officer** is a member and leads the **Harassment and Discrimination Commission**.

3.12 The **Harassment and Discrimination Commission** will be responsible for:

- (a) Address any discriminatory or harassing behaviour reported through formal grievance channels;
- (b) If necessary, or appropriate, to initiate initiatives to investigate incidents;
- (c) Recommend corrective and/or disciplinary actions, depending on the severity and extent of the incident of discrimination or harassment;
- (d) To safeguard the confidentiality and fair treatment of the parties.

3.13 The **Group's Executive Committee** will be responsible for:

- (a) Ensure that this Policy complies with legal and ethical obligations, and that all persons under the Group's control comply with it;
- (b) Approve any corrective and/or disciplinary actions recommended by the **Harassment and Discrimination Commission**, resulting from investigations conducted into complaints of discrimination and harassment.

4. UNDERSTANDING THE RISKS

4.1 In the past, the construction industry was notorious for tolerating and devaluing discrimination and harassment and, in many cases, denying that it even occurred. The small percentage of women working in the field have been taught how to deal with bullying and harassment or change professions.

4.2 The lack of women working in the industry leads to a male-dominated culture, which can allow for a hostile environment for women, and particularly sexual harassment that is more prevalent in male-dominated industries.

4.3 In construction projects, work is often carried out in environments that isolate employees, allowing potential perpetrators of acts of harassment easy access to their targets where there are no witnesses.

4.4 In addition, central offices that are physically and/or organizationally distant from frontline employees or front-line supervisors can leave managers unsure of how to handle harassment issues and make them reluctant to contact central areas for guidance.

4.5 Employees with higher positions, actual or perceived, may consider themselves exempt from compliance with workplace rules or immune to the consequences of their misconduct.

4.6 Workplaces with significant disparities in gender, race, and ethnicity can contribute to supervisors or managers feeling more comfortable mistreating lower-ranking employees. In addition, employees in a lower ranking position may be less likely to have access to or fully understand the channels for lodging complaints (language or education/training weaknesses) or fear retaliation.

5. IMPORTANCE OF INCLUSION AND DIVERSITY

5.1 Perceived discrimination has effects on both the employee and the work environment. These effects translate into a work environment in which the employee loses focus, decreased level of commitment, and exhibits unproductive work behaviors, such as not completing tasks on time, lack of concentration, or indiscipline in meeting schedules.

5.2 Promoting diversity in the workplace, across gender, race and ethnicity, while ensuring a culture of inclusion, makes employees feel valued and fosters their belonging and commitment. This consequently reduces absenteeism rates, decreases employee turnover and increases productivity, both individually and as a team.

5.3 Employees with different backgrounds bring with them their own perspectives, ideas, and experiences, helping to create organizations that are resilient and effective, and that outperform organizations that don't invest in diversity.

6. INFORMAL COMPLAINTS MECHANISM

6.1 An employee who feels that he or she is being subjected to discrimination and/or harassment should, whenever possible, clearly make his or her disapproval known to the individual(s) concerned and ask that the behavior stop.

6.2 If circumstances make it intimidating or difficult, the Mota-Engil Group, through the Informal Grievance Mechanism, provides informal means for employees to have their concerns and grievances resolved.

6.3 The Informal Grievance Mechanism is intended to provide a means of resolving problems from the outset, through channels that allow an employee who is a victim of discrimination and/or harassment to communicate with the person who offends him or her in a free, honest and non-threatening manner. It is expected that through discussion or mediation, the parties will be able to resolve most incidents and that problematic behavior will be less likely to occur or reoccur.

6.4 If the employee feels uncomfortable approaching the harasser, he should seek the guidance of third parties, such as the hierarchical manager, a Human Resources professional or the DHC.

6.5 In cases where the discriminatory behaviour and/or harassment is not serious or chronic, an attempt may be made to resolve the matter informally. If both parties agree, DHC can provide an opportunity for the affected party to express their feelings and ask for specific solutions.

6.6 DHC will:

- (a) Give the alleged aggressor or harasser an opportunity to respond to the complaint;
- (b) Facilitate discussion between both parties to reach an informal resolution that is acceptable to the complainant;
- (c) Ensure that a confidential record of events is kept through the use of the Incidents of Discrimination and Harassment application, accessible through the following [link](#), as per Annex 3.
- (d) Monitor the outcome of the Informal Grievance Mechanism to ensure that the behaviour complained about has ceased.

7. FORMAL COMPLAINT THROUGH THE ETHICS CHANNEL

7.1 If the incident is not suitable for mediation, if one or both parties refuse mediation, or if the informal grievance mechanism has not led to a satisfactory outcome for the

complainant, the complainant may lodge a formal complaint through the Group Ethics Channel.

7.2 When requested, DHC or the DHC delegate can support complainants in filing a complaint through the Group Ethics Channel³.

7.3 The Group's Corporate Compliance Department is initially responsible for receiving complaints and managing their investigation, in conjunction with the relevant areas and departments. In the case of complaints addressing Harassment and Discrimination issues, the Harassment and Discrimination Commission will act as an advisory body, in liaison with the Corporate Compliance Department, which will conduct a fair, prompt, confidential and thorough investigation, as outlined in this Policy and the Group's Reporting of Wrongdoing and Non-Retaliation Policy.

7.4 Investigations will be initiated to the extent that a complaint of discrimination and/or harassment complies with the following:

- (a) The complaint concerns discrimination and/or harassment as defined in this Policy; and
- (b) The complaint appears to have substance and to have been made in good faith.

7.5 Complainants will be informed if the incident does not constitute an incident of discrimination or harassment, and therefore will not be investigated under the Reporting of Irregularities and Non-Retaliation Policy. In such cases, they will be informed of the different options that can be taken to resolve any dispute.

7.6 If the incident constitutes discrimination or harassment, then, when carrying out the investigation, the Corporate Compliance Department in conjunction with the Harassment and Discrimination Commission will directly or indirectly, through the Group's own internal resources or an independent third party:

- (a) Interview the complainant and the alleged aggressor or harasser separately;
- (b) Interview other relevant people separately;
- (c) To make an assessment of whether the reported incident(s) constituted discrimination and/or harassment;
- (d) Produce an investigation report detailing the investigations, findings and any recommended corrective and/or disciplinary actions;
- (e) To send to the Executive Committee of the Group a follow-up report on the cases under investigation and, if necessary, the approval of the suggested measures;

³ etica@mota-engil.com | <https://mota-engil.whisppli.com/lp/raiseaconcern?locale=pt-pt#refresh>
Compliance – Rua do Legó Lameiro, n.º 38, 4300 – 454 Porto.

- (f) Follow up on the case to ensure that approved recommendations are implemented, that any disciplinary actions are applied and that the behaviour has ceased;
- (g) If it is not possible to determine that an incident has occurred that constitutes discrimination and/or harassment, the Corporate Compliance Department in conjunction with the Harassment and Discrimination Commission may still issue recommendations to ensure the proper functioning of the workplace;
- (h) Keeping a record of all actions taken under the Group's Whistleblowing and Non-Retaliation Policy;
- (i) Ensure that all records relating to the case are confidential.

8. CONFIDENTIALITY AND NON-RETALIATION

8.1 Employees who in good faith file a complaint of discrimination or harassment should not be subject to retaliation. A breach of trust or an act of retaliation against any employee who has reported a concern or supported the investigation process will also be treated as a breach of this Policy and the Group's Code of Ethics and Business Conduct.

8.2 The practice of any acts of retaliation, consisting of an action or omission that, occurring in a professional context and following an internal complaint, causes or may cause material or non-material damage to the complainant, namely, but not limited to, intimidation, or discrimination, disciplinary actions, withholding or suspension of salary payments, is prohibited.

8.3 Adverse actions taken against a complainant that appear to result from the filing of a complaint or the use of the Group's Incident Resolution Mechanism will be thoroughly investigated.

8.4 An employee must not intentionally raise a false or frivolous complaint of discrimination or harassment. Those who knowingly, or without good faith, make false reports may be subject to disciplinary action.

8.5 All employees and other persons who are aware of a complaint of discrimination or harassment, or who are involved in its resolution, must recognize the seriousness of the situation and respect the sensitivity and confidentiality that should be attributed to the matter. They should refrain from discussing the complaint with each other or with anyone who does not "need to know" in the context of the investigation or reporting requirements.

9. CONSEQUENCES OF HARASSMENT AND DISCRIMINATION

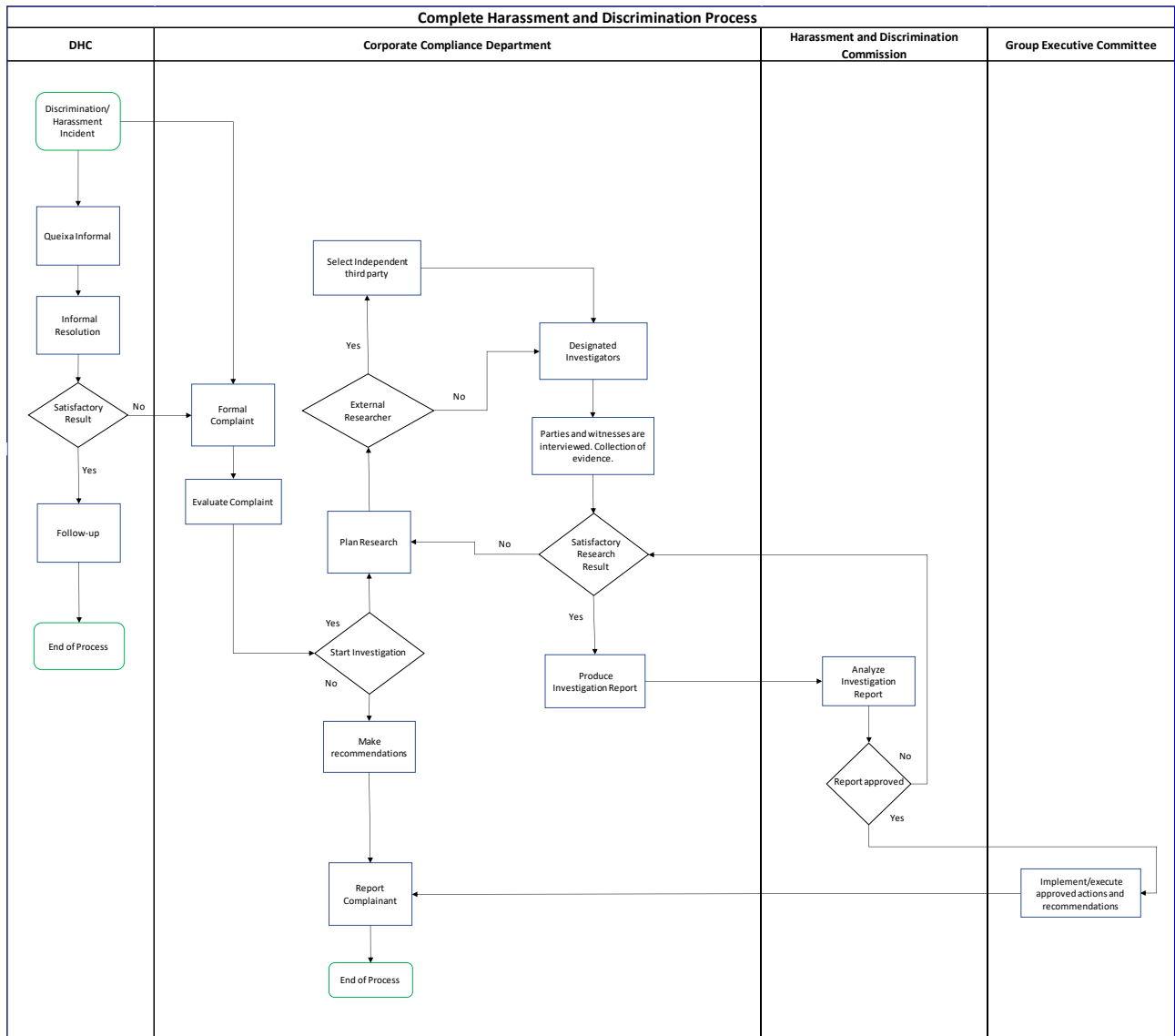
9.1 The Mota-Engil Group will adopt effective measures to punish acts of harassment or discrimination, establishing, if applicable, the competent disciplinary proceedings and applying effective disciplinary sanctions, which may involve, among others, the dismissal with just cause of the employee who performs the acts.

9.2 In addition, the Mota-Engil Group may adopt legal measures aimed at preserving or restoring its rights and/or the rights of the victim.

10. DISCLOSURE

This Policy is disclosed to all Employees of the Group. Without prejudice, it must also be disclosed on the Mota-Engil Group's website, in a clear, transparent and accessible manner.

ANNEX 1 – FLOWCHART OF THE COMPLETE HARASSMENT AND DISCRIMINATION PROCESS



ANNEX 2 – DHC LIST

Available on the On.ME Portal at "*Documentation*", in the "Policies" tab.

ANNEX 3 – APPME INCIDENTS OF HARASSMENT AND DISCRIMINATION

The application for recording incidents of harassment and discrimination is available through the following [link](#).

MOTAENGIL

Um Mundo de Inspiração

