



MOTÆNGIL
Building with Purpose

INTEGRITY AND COMPLIANCE PROGRAM

09.2025
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Tone from the Top



“Tone from the Top”



Mota-Engil’s integrity path and consciousness of the company’s role in improving the conditions of the communities where it operates, lasts since the incorporation for more than the 78 years ago.

Therefore, being aware of its role in society, the Group has been continuously developing its Integrity and Compliance Program¹, supported in the Mota-Engil's Code of Ethics and Business Conduct, in the internal cross-cutting Policies and Procedures, a strengthened governance model and a program of continuous improvement and training/awareness covering the Group and all its stakeholders.

This Program challenges us all to adhere to integrity and sustainable behaviours in full compliance with its internal regulations and with the most demanding legal and ethical framework in each market where we operate.

The Integrity and Ethics challenge is even more demanding because the Group operates in multiple businesses, in multiple geographies and cultures, and with a large number of employees, partners, suppliers, public and private customers, shareholders and other stakeholders.

In short, we must comply with the laws, rules, and regulations, but also act with a high sense of responsibility and business ethics in order to continue writing the Group's success story, always supported by values of integrity, social responsibility, and sustainability.

These values must guide our individual daily conduct, so that in this joint commitment we can do justice to the motto "We are all responsible for Integrity and Compliance!"



Carlos Mota Santos
*Chairman of the Board of
Directors and CEO*

¹ Designation of Mota-Engil Group's Regulatory Compliance Program, in compliance with the obligations established by the Portuguese Decree-Law no. 109-E/2021.

Mota-Engil Ethics Commitment



The Group's Code of Ethics and Business Conduct sets out Mota-Engil's core values, which are based on our business ethics and our commitment to integrity.

This is the culture of Mota-Engil Group that we promote every day:

- ✓ Ethical behaviors in all our actions;
- ✓ Exemplary conduct, complying with the laws in all countries where we operate and always faithful to the internal rules of the Group and our companies;
- ✓ An attitude of respect and recognition for different ways of working, as well as lifestyle and cultural differences;
- ✓ Environmental protection and support to local communities.



Continuous Improvement

Objectives of the Program

Program Timeline



Program Objectives



Integrity and Compliance Program Objectives

- ✓ Comply with the obligations established by legal diplomas, rules and regulations;
- ✓ Prevent financial and reputational damage to Mota-Engil;
- ✓ Identify problems in advance;
- ✓ Detect illegal acts in other organizations;
- ✓ Fortify company's reputation;
- ✓ Enhance employee awareness;
- ✓ Get higher trust from Mota-Engil Stakeholders.

Compliance as a Competitive Advantage



The Value of Compliance

- ✓ Beyond financial penalties, a compliance failure can wreak havoc on an organization's reputation and customer relationships and negatively impact growth and profitability targets for the foreseeable future;
- ✓ Compliance is a necessary business obligation and its importance – and complexity – will only continue to grow;
- ✓ Our job is to mitigate the risk to the organization, but not in a way that hampers the organization's ability to function as intended, be innovative and make money;
- ✓ Risk is rooted in behavior, that's why alignment with the business is so critical to cultivate a culture of compliance built around ethical behavior. Doing this well, makes the business stronger and can become a distinct competitive advantage.

A Risk Focused Global Program

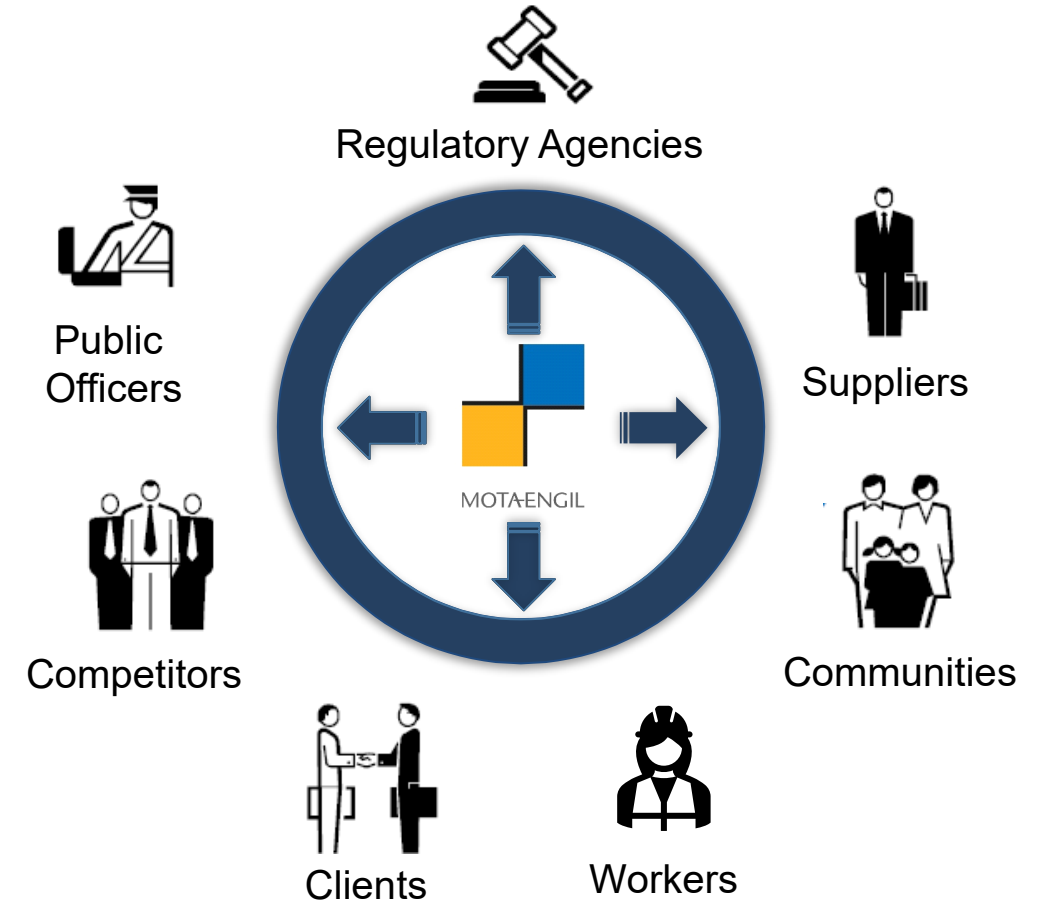


Compliance Risk Prevention Plan²

- ✓ The Risk Prevention Plan (RPP) is designed and for continuous improvement based on a risk approach by identifying, classifying, preventing and mitigating the most critical risks that the organization is exposed to;
- ✓ The Risk Management Process considers the probability of occurrence and the foreseeable impact of each situation, as well as the different activities and location of the organization;
- ✓ The RPP considers the complexity of the relations with interested parties and how different stakeholders imply different risks.

² This includes risks of corruption and related infractions.

Relations with Interested Parties



A Risk Focused Global Program



Compliance Risk Prevention Plan

Other Considerations



Corruption and Related Infractions

- ✓ Gifts and hospitalities;
- ✓ Donations and sponsorships;
- ✓ Cash payments;
- ✓ Business relationships with third parties;
- ✓ Conflict of Interest.



Anti-Competitive Practices

- ✓ Share of information with competitors;
- ✓ Participation in industry association meetings;
- ✓ Relationship and agreements with competitors, clients or suppliers;
- ✓ Collusion risk with competitors.



Reporting Misconduct

- ✓ Effective and trusted mechanism;
- ✓ Fear of retaliation;
- ✓ Complaint-handling process;
- ✓ Process timely completion.



Money Laundering and Terrorism Financing

- ✓ Cash payments;
- ✓ Donations and sponsorships;
- ✓ Business relationships with third parties;
- ✓ High-risk transactions.

A Risk Focused Global Program



Compliance Risk Prevention Plan Other Considerations



Privacy and Data Protection



Customs and Tax Legislation



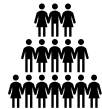
Harassment
and Discrimination



Aspects related with Fraud and Conflict of
Interests



Labour Relationships
and Recruitment



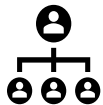
Social Responsibility and Communities



Human Rights



Value chain and suppliers

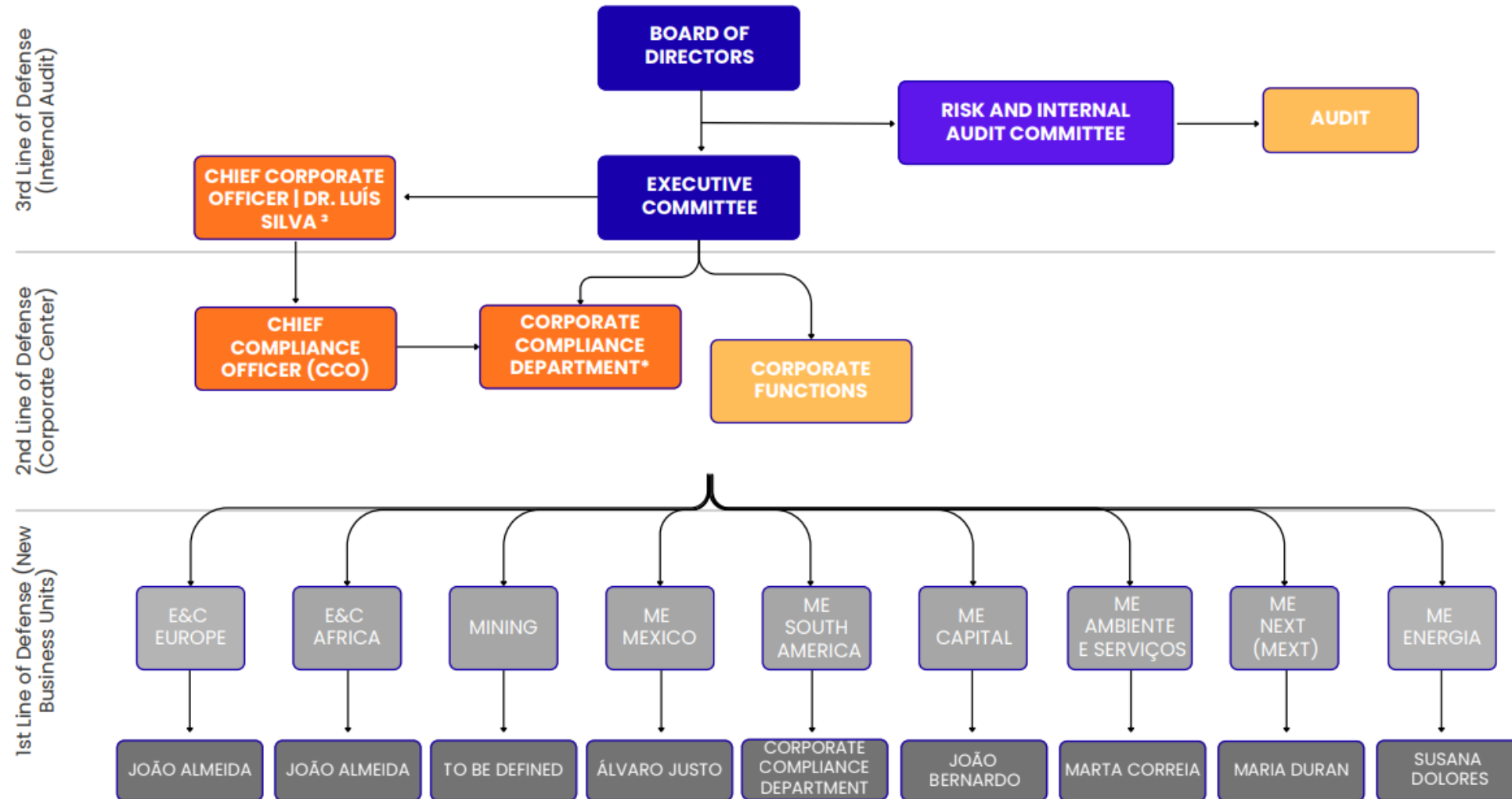


Tone at the Top



ESG

Compliance Organization and Governance Model



³ Responsible for Regulatory Compliance appointed by the Mota-Engil Group, in compliance with the obligations established by Decree-Law 109-E/2021

*Data Privacy part of the Corporate Compliance Department since July 2025

1827

Mota-Engil Group

General Internal Standards



Mota-Engil Group General Internal Standards



Integrity and Compliance Program

Compliance Code, Policies and Procedures

- A. Code of Ethics and Business Conduct;
- B. Supplier Code of Ethics and Conduct;
- C. Anti-Corruption and Bribery, Anti-Money Laundering and Counter Terrorism Financing Policy;
- D. Fair Competition Policy;
- E. Related Party Transactions Policy;
- F. Anti-Harassment and Discrimination Policy;
- G. Whistleblowing and Non-Retaliation Policy;
- H. Human Rights Policy.

I. Group Compliance Procedures:

- ✓ Third Party Procedure;
- ✓ Gifts and Hospitalities Procedure;
- ✓ Corporate Social Responsibility and Donations Procedure;
- ✓ Cash Procedure;
- ✓ Conflicts of Interest Procedure;
- ✓ Organizational Conflicts of Interest Procedure.

Mota-Engil Group General Internal Standards



Compliance Code, Policies and Procedures

A. Code of Ethics and Business Conduct

- ✓ The Mota-Engil Code of Ethics and Business Conduct provides an overview of the Company's fundamental business values and applies to every member of Company staff, directors, consultants, contractors, and subcontractors, and also applies to Company subsidiaries worldwide;
- ✓ The Code summarizes some of the most important Company principles and policies and should be used in conjunction with local laws and regulations in evaluating behavior;
- ✓ It is mandatory all employees review the Code as they will be expected to understand and comply with the entire policy;
- ✓ Mota-Engil's Code of Ethics and Business Conduct was last updated on 18th December 2023.



Compliance Code, Policies and Procedures

B. Supplier Code of Ethics and Conduct

- ✓ 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 applicable laws in the markets where we operate are the cornerstones of these relationships;
- ✓ The Supplier Code of Ethics and Conduct summarizes some of the Company's most important social and environmental standards and practices, based on the Ten Principles of the United Nations Global Pact among other references;
- ✓ It is mandatory that all suppliers explicitly adhere to the Code as they are expected to understand and comply with all principles and values, in joint projects with the Group or outside it.
- ✓ Mota-Engil's Supplier Code of Ethics and Conduct was approved on 15th July 2024.



Compliance Code, Policies and Procedures

C. ABC, AML and CTF Policy

- ✔ Mota-Engil has a zero tolerance policy towards bribery, corruption, money laundering and terrorist financing prohibiting these acts in any form, whether directly or through others, anywhere in the world;
- ✔ Mota-Engil prohibits giving anything of value to public officials, either directly or indirectly (e.g. via third parties or family members), including “facilitation” or “grease” payments;
- ✔ Mota-Engil also prohibits receiving bribes in any form, and employees must report any bribery attempts or receipt of bribes;
- ✔ Mota-Engil’s ABC, AML and CTF Policy was last updated and approved on 19th December 2022.



Compliance Code, Policies and Procedures

D. Fair Competition Policy

- ✔ Mota-Engil has adopted a zero-tolerance policy towards Anti-Competitive Practices and prohibits such acts in any form, whether directly or through third parties, anywhere in the world;
- ✔ Mota-Engil prohibits any engagement in cartel and other collusive practices, including the involvement in any behavior that causes or appears to cause a restriction or limitation of competition;
- ✔ It is also prohibited to establish agreements with other companies not to hire certain candidates or to coordinate compensation policies, as well as using participation in industry or trade association events and related contacts for anti-competitive purposes;
- ✔ Mota-Engil's Fair Competition Policy was approved on 7th June 2021.



Compliance Code, Policies and Procedures

E. Related Party Transactions Policy

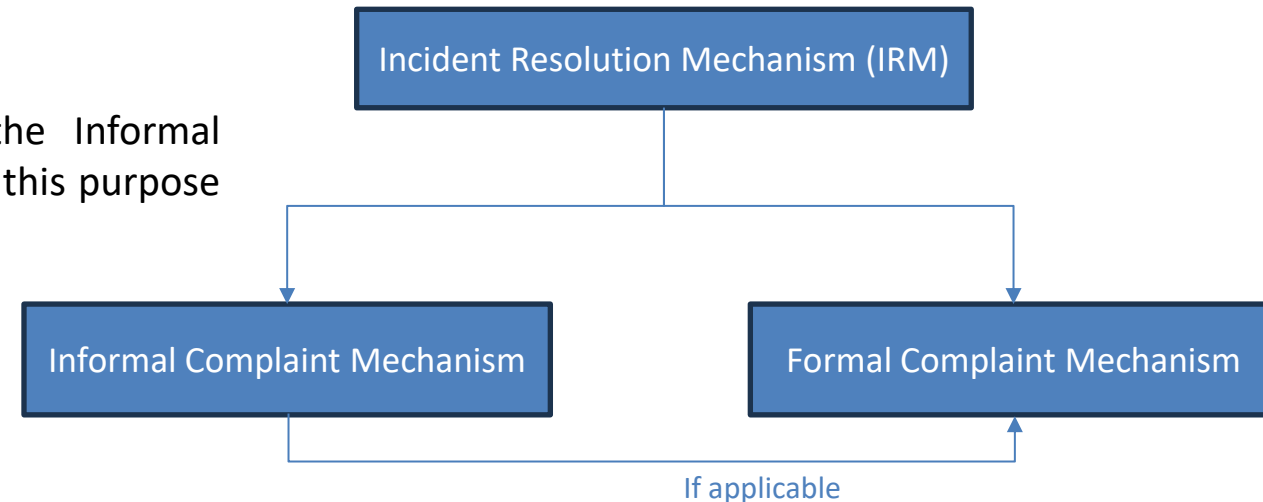
- ✓ A related party transaction is defined as a transaction other than a transaction in the ordinary course of business between the Group and a Related Party;
- ✓ Mota-Engil is aware that transactions with Related Parties can harm companies and their shareholders, as they can provide the Related Party with the opportunity to appropriate a portion of the value of a company;
- ✓ In any transaction with a Related Party, a series of procedural issues must be considered as a necessary safeguard for the adequate protection of the interests of companies and shareholders who are not Related Parties, including minority shareholders;
- ✓ Mota-Engil's Related Party Transactions Policy was last updated and approved on 19th December 2022.



Compliance Code, Policies and Procedures

F. Anti-Harassment and Discrimination Policy

- ✓ This Policy aims to promote a workplace free of harassment, discrimination, and intimidation, where all employees can work together with honesty, trust, and respect for differences;
- ✓ All forms of harassment and discrimination may be considered improper conduct subject to disciplinary action, including, if necessary, termination of employment;
- ✓ The Group, through the Incident Resolution Mechanism (IRM), provides informal means for employees to have their concerns and complaints resolved;
- ✓ The reporting and management of cases through the Informal Complaint Mechanism is done on a platform created for this purpose – AppME Harassment and Discrimination Incidents.

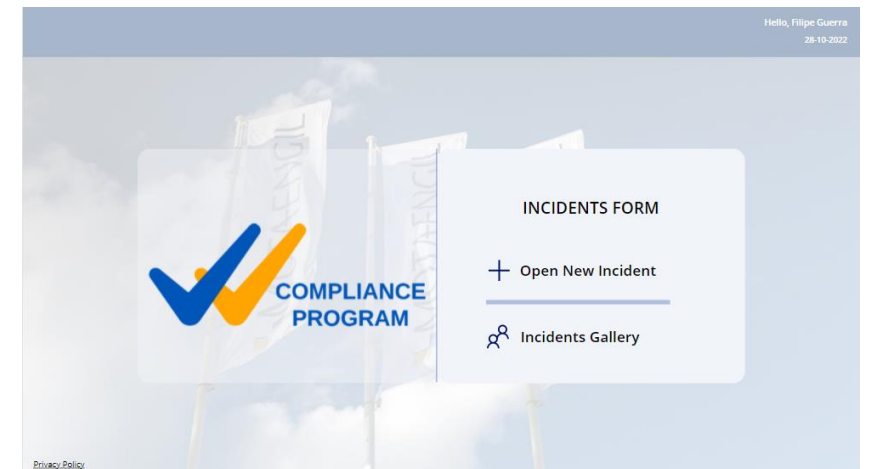




Compliance Code, Policies and Procedures

F. Anti-Harassment and Discrimination Policy

- ✓ The role of **Discrimination and Harassment Counsellor (DHC)** has been created to provide support mechanisms that enable victims of discrimination and/or harassment to communicate with the offender in an open, honest, and safe manner;
- ✓ Additionally, a **Harassment and Discrimination Committee** has been established to handle all complaints received through the **Formal Complaint Mechanism**, which is operated by the **Group Ethics Channel management team**;
- ✓ This revision of the Policy was approved on **June 16, 2025**, and the List of DHCs was also updated, as expressly communicated in **OS/ME/031/2025** dated **July 10, 2025**.





Compliance Code, Policies and Procedures

G. Whistleblowing and Non-Retaliation Policy

- ✔ The Ethics Channel is available for voluntary use;
- ✔ The Corporate Compliance Department, responsible for managing the Ethics Channel, has made available Practical Guides and FAQs to support the compliance network and all users in the correct use of these mechanisms;
- ✔ Whistleblowers may report anonymously. In cases where the whistleblower chooses to reveal their identity to expedite the investigation process, Mota-Engil will ensure that the whistleblower's identity remains confidential;
- ✔ Mota-Engil will not penalize or discriminate against any employee who uses the reporting system to raise a genuine concern in good faith regarding identified irregularities;
- ✔ The Mota-Engil Policy on Reporting Irregularities and Non-Retaliation was updated and approved on June 26, 2023.



Compliance Code, Policies and Procedures

H. Human Rights Policy

- ✓ At Mota-Engil, we aspire to be an example of integrity and respect for the people and for the planet, and as such, we commit to respect internationally recognised human rights across all our activities and throughout our global value chain;
- ✓ To fulfil our commitment towards human rights, we endeavour to carry out meaningful human rights and environmental due diligence to identify and address the actual or potential adverse impacts with which we may be involved through our own activities and throughout our business relationships;
- ✓ Mota-Engil's Human Rights Policy was updated on 16th December 2024.



Compliance Code, Policies and Procedures

I.1 Third Party Procedure

- ✓ Mota-Engil expects that all 3P with whom it carries out business act with integrity and in compliance with the applicable laws;
- ✓ The commencement of a business relation with a 3P is preceded by a due diligence and a risk assessment process, which includes the following actions:
 - 3P Due-Diligence Questionnaire
 - Risk Assessment
 - Risk Rating
 - *Screening/Due diligence*
 - Approval Workflow
 - Enhanced Due diligence (where applicable)
 - Risk Mitigating Measures (where applicable)
- ✓ Mota-Engil's Third Party Procedure was last updated on 2nd December 2024.

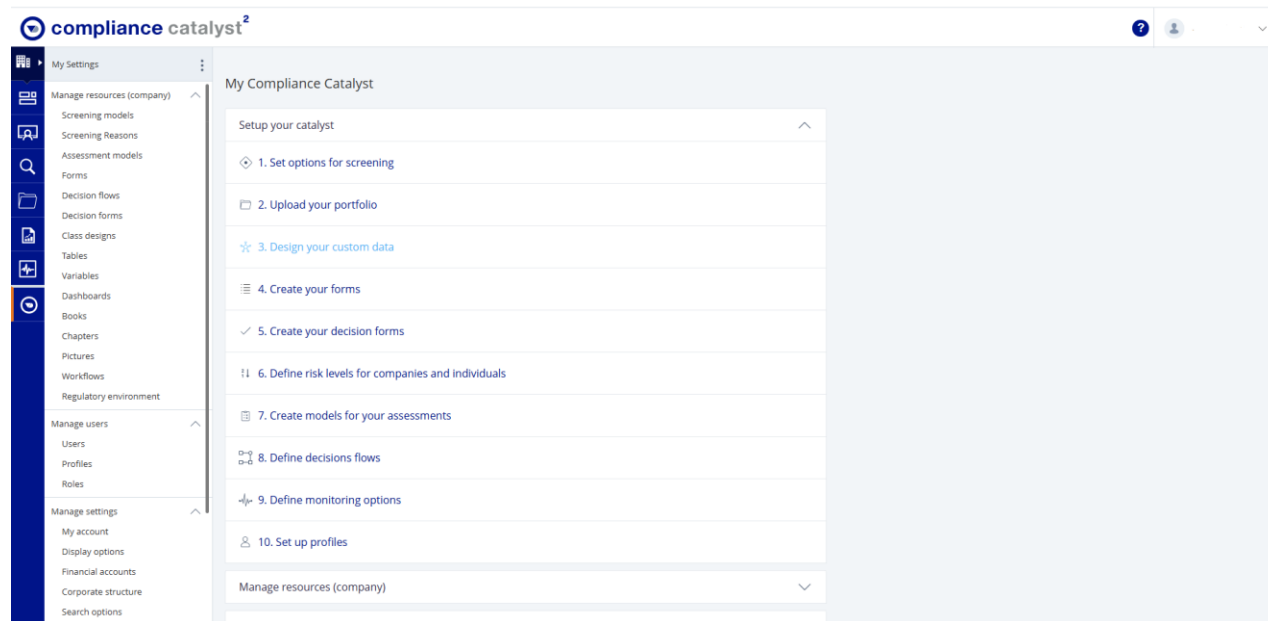
Mota-Engil Group General Internal Standards



Compliance Code, Policies and Procedures

I.1 Third Party Procedure | 3P Management Platform and Screening Tools

Moody's | Compliance catalyst platform supports Mota-Engil's 3Ps Full Process



Main Features:

- ✓ 3P Due Diligence Questionnaires
- ✓ 3P Risk Rating
- ✓ Screening and remediation
- ✓ Ongoing monitoring
- ✓ Order and store Due Diligence investigations on 3Ps
- ✓ Host 3Ps training
- ✓ Analytics
- ✓ Auditable log of all user activity
- ✓ Screening of Employees based on their role and position within the Group

Mota-Engil Group General Internal Standards



Compliance Code, Policies and Procedures

I.1 Third Party Procedure | 3P Management Platform and Screening Tools

DOW JONES | FACTIVA - screening tools for conducting 2nd level enhanced Due Diligence



Main Features:

- ✓ Screening on companies and individuals
- ✓ Enhanced Adverse Media Screening
- ✓ Ultimate Beneficial Owners (UBOs) identifier
- ✓ Real time alerts on selected entities



Compliance Code, Policies and Procedures

I.2 Gifts and Hospitality Procedure

- ✔ Mota-Engil permits the giving and accepting of gifts of nominal or token value, and reasonable hospitality and entertainment of Company clients and third parties;
- ✔ Employees should never accept gifts or hospitality from counterparties or individuals dealing with the Company unless they are customary and commonly accepted business courtesies, and given without any implication of influence over business decisions;
- ✔ All offers given or received must be registered in the **AppME Offers and Hospitality Register**.
- ✔ Mota-Engil's Gifts and Hospitality Procedure was last updated and approved on 20th December 2022.

The screenshot shows the 'Gifts and Hospitality Register' form. At the top, there is a blue header with the Mota-Engil logo and the title 'Gifts and Hospitality Register'. Below the header, there is a blue box containing the following text: 'Mota-Engil allows the donation and acceptance of gifts up to a maximum value of €100, provided that they are linked to a legitimate business purpose. Please refer to the "Gifts and Hospitality Procedure" for further information.' Below this, there is a white box with a blue border containing the following text: 'Hi, Maria. When you submit this form, the owner will see your name and email address.' Below this, there is a red asterisk indicating a required field. The form has three main sections: 1. 'ME Company *' with a sub-label 'Please type SAP number with 4 digits' and a text input field with a placeholder 'Number must be between 1000 ~ 9999'. 2. 'Employee Line Manager *' with a sub-label 'Please type your Line Manager's e-mail' and a text input field with a placeholder 'Enter your answer'. 3. 'Type of Third Party Entity associated with the Gift *' with three radio button options: 'Private', 'Public', and 'Local Communities'.



Compliance Code, Policies and Procedures

I.3 Corporate Social Responsibility and Donations Procedure

- ✔ Charitable contributions and sponsorship of public interest activities of recognized charities and non-profit organizations are allowed, so long as such support is not used to reward the recipient for present, past or future use or support of Mota-Engil projects or to result in a business advantage;
- ✔ Every effort must be made to ensure that donations are not being used as an improperly by a public official or persons affiliated with public officials;
- ✔ Mota-Engil's Corporate Social Responsibility and Donations Procedure was last updated on 30th October 2023. This version was updated on July 6, 2025, exclusively to include operational updates for the AppME Donativos application.



Compliance Code, Policies and Procedures

I.4 Cash Procedure

- ✓ The payment of expenses using petty cash fund should be exceptional and related with the Company business activity;
- ✓ The maximum amount which may be claimed in respect of any item through the petty cash system is EUR 150. The payment of donations, sponsorships and any consultant fees using petty cash is prohibited;
- ✓ Mota-Engil's Cash Procedure was approved on 5th July 2017.



Compliance Code, Policies and Procedures

I.5 Conflicts of Interest Procedure

- ✔ Group employees must avoid conflicts of interest of an ethical, legal, financial, personal, or other nature, and ensure that their personal activities and interests do not override their obligations to the Group;
- ✔ Mota-Engil recognizes that avoiding a conflict of interest is not always possible or practical. The necessary action for an employee who cannot avoid a conflict of interest is to disclose it;
- ✔ To make the identification of conflict-of-interest situations more operational, in July 2025, a Conflict of Interest Form was integrated into the hiring process managed by Human Resources, in accordance with the relevant procedure, thereby making this verification more effective and widespread across the Group;
- ✔ The Mota-Engil Conflict of Interest Procedure was updated and approved on May 13, 2024.



Compliance Code, Policies and Procedures

I.6 Organizational Conflicts of Interest Procedure

- ✓ Jurisdictions around the world recognize that an organizational conflict of interest may result in the disqualification of a bidder. Since organizational conflicts of interest can be so varied it is important to address them with a procuring agency so that the Group and the agency, can take appropriate mitigating steps;
- ✓ Having an organizational conflict of interest can become a problem or a legal matter if it gives rise to an unfair competitive advantage or undermines the Group's service to a public agency;
- ✓ Business units within the Group should be careful to note when and where they may be required to make disclosures regarding a potential or actual conflict of interest. A discussion within the affected business unit should be the starting point for identifying and potentially disclosing an organizational conflict of interest;
- ✓ Mota-Engil's Organizational Conflicts of Interest Procedure was approved on 23rd May 2024.



*Training and
Communication*

Training and Communication



✓ In 2024 our employees conducted 20,500 web-validated training sessions focused on integrity and compliance topics, reinforcing our commitment to ethics and organizational compliance.

YEAR	COMPLIANCE TRAINING TOPIC	CALENDAR	CURRENT STATUS
2021	Anti Money Laundering	1T 2021	Finished
	Privacy & Confidential Information	1T 2021	Finished
	Conflicts of Interest	2T 2021	Finished
	Fair Competition	4T 2021	Finished
2022	Creating Strong Passwords	2T 2022	Finished
	Harassment & Discrimination	2T 2022	Finished
	Phishing	2T 2022	Finished
	Social Media - Maintaining Security	3T 2022	Finished
2023	Whistleblowing	2T 2023	Finished
	Code of Ethics and Business Conduct	1T 2024	Finished
2024	Avoiding Retaliation	2T 2024	Finished
	Corruption and Bribery	3T 2024	Finished
	Gifts and Hospitality Campaign	4T 2024	Finished
2025	Harassment and Discrimination	1T 2025	Finished
	Fair Competition	2T 2025	Finished
	Human Rights	3T 2025	In progress
	Gifts and Hospitality	4T 2025	To be determined



Training | Awareness & Communication Actions



Awareness Actions for Top Management "Corporate Enforcement Landscape" | Skadden Law Force

Clarification Sessions for the markets on the Third-Party Procedure

In-person and remote training for 136 Top Managers 'Corporate Compliance Updates' | Skadden LLP

Fair Competition Sessions | Training targeted at risk groups

Several seminars with the participation of the Discrimination and Harassment Counsellors (DHC) from Group companies

Clarification Sessions for the markets on the Donations Procedure and Corporate Social Responsibility

Top Management Awareness Session: "Money Laundering, Terrorism Financing, and Corruption"

Compliance Radar | Communications sent to Top Management

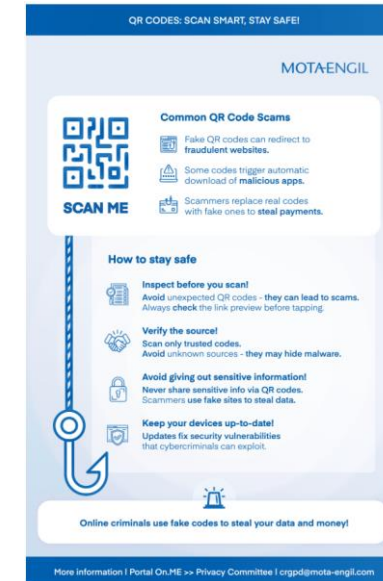
Thematic alignment sessions on Compliance for the Group's BUCO

Training actions organized locally by the Business Units in (Mexico, Colombia, Peru, Brazil and Uganda)

Training and Communication | Data Privacy



- ✓ In 2025, our employees completed over 40,000 validated training sessions via the web, focused on safety and compliance topics. These sessions were designed for all employees and included specific modules for newly onboarded staff.
- ✓ Among the topics covered were “How to create secure passwords,” “How to become a human firewall,” and “Travel safety,” all part of the Security Snapshots series.
- ✓ These trainings aim to raise awareness about threats such as phishing, ransomware, social engineering, and the safe use of mobile devices and public networks.



Training and Communication



Internal Portal | ON.ME

The Team / A Equipa
See +

COMPLIANCE

"The good name and reputation of Mota-Engil SGPS, S.A. are the product of the dedication and hard work of each and every one of us. Together, it is our responsibility to preserve and improve that reputation. Our goal is not only to obey the laws, rules, and regulations that apply to our business, but also to strive to achieve high standards of business conduct. We run our business in a direct, clear, and ethical manner. We take full responsibility for what we do and what we say, and we strive to create a challenging and motivating working environment that rewards teamwork. We respect and recognize different ways of working, as well as lifestyle and cultural differences."



Carlos Mota Santos
Chairman of the Board of Directors and CEO

"A reputação do Grupo Mota-Engil é o resultado da dedicação e do trabalho árduo de cada um de nós. (...) O nosso objetivo não é apenas cumprir as leis, regras e regulamentos aplicáveis ao nosso negócio, mas também lutar por altos padrões de conduta empresarial. Conduzimos os nossos negócios de forma direta, clara e ética. Assumimos total responsabilidade pelas nossas ações e palavras, esforçando-nos por criar um ambiente desafiante e motivador que valorize o trabalho em equipa. Respeitamos e reconhecemos diversas formas de trabalhar, bem como estilo de vida e diferenças culturais".

+ More / Mais

What's New!

Public website

ABOUT US

Ethics and Compliance



Ethics and Compliance

The Values of the Mota-Engil Group are based on ethical principles that we consider decisive in affirming a strong and cohesive collective identity, translated into an organisational culture, which we believe sets us apart and drives us towards a greater purpose that guides our collective conduct.

In a compliance system that is intended to be robust and guided by ethical principles rooted in the Group's culture, we periodically promote the internal review of procedures to promote continuous improvement, in a group that is certified and committed to the best market practices regarding transparency of conduct.

A robust Compliance system in line with best practices

Based on Integrity and on an ethically committed behaviour towards the society in which we operate, the Mota-Engil Group promotes the highest standards of conduct, based on honesty, loyalty and respect for dignity and individual rights. These principles are reflected in the Code of Ethics and Conduct that has long been in force in all the countries where we operate.

In order to ensure commitment across the board, we share the [Code of Ethics and Conduct](#) with each new hire as a central part of their welcome, reinforcing knowledge and collective commitment within the scope of their responsibility, also making available on the internal portal and website the [Integrity and Compliance Programme](#), the Prevention Plan for Risks of Corruption and Related Offences, and the [Anti-Corruption and Bribery, Prevention of Money Laundering and Terrorist Financing Policy](#).

Supplier Code Of Ethics And Conduct

The requirement for integrity and transparency applies not only to the Group's companies and employees, but also to its partners and subcontractors. In addition to their technical competence and ability to fulfil their obligations, subcontractors are also assessed on their own commitment to respecting human rights and business ethics.

Safety And Sustainability As Core Pillars Of Action

The daily actions of each Mota-Engil Group employee must be in line with the group's purpose, promoting a space for individual and inclusive development. As part of this policy, we defend and promote gender equality and the defence of human rights as a cornerstone of our collective behaviour, complemented by a SHEQ policy that places the individual as the central concern of our actions, in a transversal safety requirement with all our partners.

To have a robust system in line with business conduct standards, every irregularity or complaint can be reported via the Whistleblowing Channel provided by Mota-Engil, for the safe irregularities or observed practices and transparent behaviour, as reflected and supported by our internal countries where we operate. Total information provided, which is received by an independent team directly connected to the Whistleblowing Channel.

Whistleblowing channel

Submit your report →

- Code of Ethics and Business Conduct
Download pdf
- Supplier Code of Ethics and Conduct
Download pdf
- Integrity and Compliance Program
Download pdf
- Anti-Corruption and Bribery, Prevention of Money Laundering and Terrorist Financing Policy
Download pdf

The background features a series of concentric, wavy blue lines that create a sense of depth and movement. A solid horizontal blue line runs across the middle of the image, extending from the left edge to the right edge. The text 'Toolkits' is positioned to the right of this line, centered vertically relative to it.

Toolkits

Toolkits | Instructions & Practical Guides*

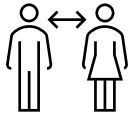


- ✓ Practical Guide for the Role of the DHC;
- ✓ Practical Guide for Handling Reports in the Whispli Ethics Channel;
- ✓ Practical Guide for Internal Investigations;
- ✓ Internal Instruction for the Ethics Channel;
- ✓ Practical Guide for the activities of the BUCO (Business Unit Compliance Officer).

* Available on the Internal Portal in the Compliance section



AppME Donations | Donation Registry



AppME Harassment and Discrimination Incidents | Registry of Harassment and Discrimination Incidents by DHC's



AppME Gifts and Hospitality Registry | Registry of Gifts and Hospitality



AppME Conflict of Interest Declaration | Conflict of Interest Declaration Form

A screenshot of a web form titled "Corporate Social Responsibility DONATIONS Questionnaire" for MOTAENGL. The form includes a language dropdown set to "English (United Kingdom)", a disclaimer about data collection, and three required fields: "1. Official Entity Name", "2. Registration Number (Tax ID #)", and "3. Website". Each field has an "Enter your answer" placeholder. The form is overlaid on a background illustration of people holding hearts.

* Available on the Internal Portal in the Compliance section

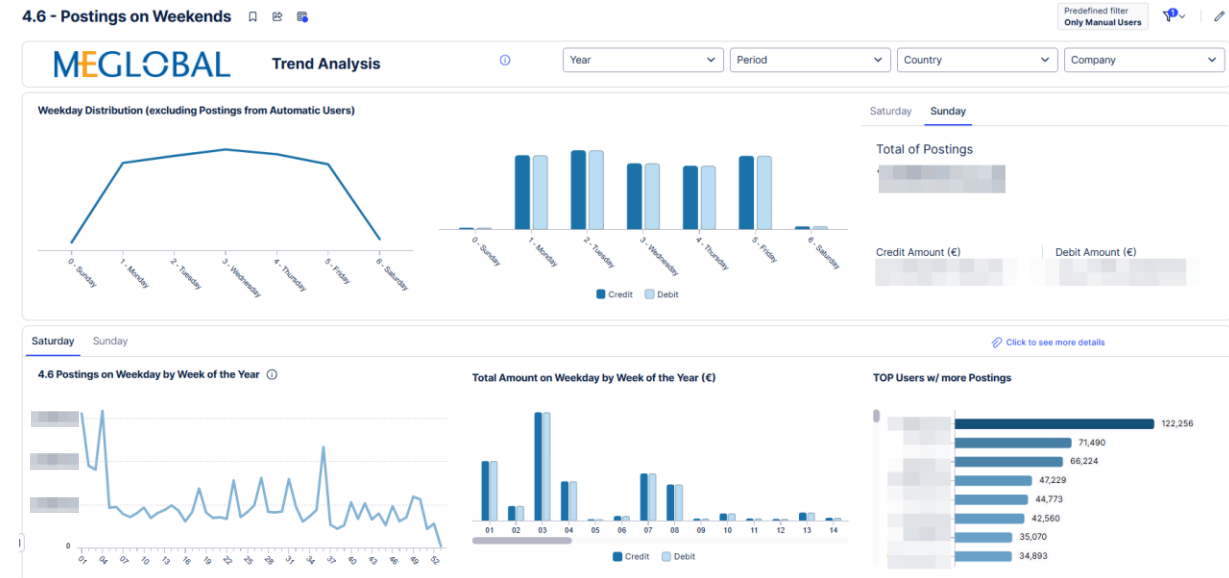
An aerial, top-down view of a large stadium. In the center is a green soccer field with white markings, including the center circle and goal areas. Surrounding the field is a reddish-brown running track with multiple lanes. The stadium seating is visible as a series of curved rows in shades of green and orange. The entire stadium is set against a dark blue background with a horizontal blue line passing through the center.

*Preventing and
Detecting*

Preventing and Detecting



- ✓ Data driven operating model, using data in monitoring the Program effectiveness;
- ✓ Robust automated monitoring was designed to provide ongoing surveillance, review, and analysis of transactions that may rise any potential integrity concerns;
- ✓ Sampling testing focus on the effectiveness of the compliance controls and adherence to Group General Internal Standards.



Preventing and Detecting



- ✓ We have established incentives for compliance and disincentives for non-compliance, throughout a comprehensive variable compensation system and clear disciplinary measures in place;
- ✓ We conduct surveys on our employees to gauge the compliance culture;
- ✓ The Third Line of Defense: Internal Audit sets periodic audits to ensure that controls are functioning well, to understand what is working and what needs enhancement;
- ✓ Independent testing is periodically performed to evaluate our Integrity and Compliance Program maturity and spot enhancement opportunities to increase the effectiveness of the organization's program.

Investigation of Misconduct and Remediation



- ✓ Mota-Engil sustains a well-functioning mechanism for the timely and thorough investigations of any allegations or suspicions of misconduct by the company, its employees, or third parties engaged;
- ✓ The investigations are properly scoped, objective, independent and conducted by qualified personnel ensuring that is appropriately documented, including any disciplinary or remediation measures taken;
- ✓ Whenever necessary, the heads of companies, business units or even the Executive Board are involved;
- ✓ Investigations, audit findings and remediation progress are reported to the Audit, Investment and Risk independent committee on a regular basis.

Tone from the Top



“Tone from the Top”



Safeguarding integrity at work and in business is more than a legal obligation, it is an ethical obligation to ensure respect for each employee and each partner of our companies. Only on this basis can the trust and safety that enable the economic and social sustainability of any company be seen.

Thus, it is the responsibility of Mota-Engil management to ensure that the rules included in the Code of Ethics and Business Conduct and in the Anti-Corruption and Bribery, Prevention of Money Laundering and Terrorist Financing Policy, are up to date. But it is also crucial to ensure that all these rules and practices are known to all business leaders and all employees and that we have agile, easy and safe whistleblowing or general use channels.

This document identifies the path built by Mota-Engil in the definition and revision of codes and manuals, in the training provided in the most diverse points and levels of the Group and in the institutionalization of those channels.

The Integrity and Compliance Program is a project in continuous review and improvement, in a permanent construction that can never be completed, to the extent and whenever our business takes on new formats, new geographies, new areas and new employees are admitted to Mota-Engil.



Sofia Salgado Pinto
Independent Director

MOTA-ENGIL

Building with Purpose

Europe

Portugal
Spain

África

Angola	Guinea-Conakry
Mozambique	Cameroon
Malawi	Côte d'Ivoire
South Africa	Kenya
Zimbabwe	Nigeria
Uganda	Senegal
Rwanda	

América Latina

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