



# COMMUNITIES POLICY

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Document Sheet

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The Mota-Engil Group is guided by a follow-up and continuous innovation approach engrafted in its policies and procedures. Therefore, information provided in the Policy is subject to updates and Mota-Engil reserves the right to streamline the document whenever seen fit.

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## 1. FRAMEWORK AND PURPOSE

At Mota-Engil Group communities are viewed as major stakeholders, to build a sustainable and inclusive legacy. Putting people first we are committed to actively contributing to the development of those communities where we have set up shop, and therefore respecting their culture, local features and promoting human dignity.

This policy is fully meshed with the Group's Corporate Social Responsibility approach and is in line with the United Nations Sustainable Development Goals, the aim being to formalise the principles and guidelines that drive our community engagement. We believe that real involvement of communities at the early stages of a project is critical to generate shared value and promote robust and long-lasting relationships – on this issue, reference is made to Chapter 1 "Framework and Purport", [Social Responsibility Policy](#).

Action carried out by Mota-Engil within those communities prioritises the following action pathways:

- ✓ To generate a positive impact by fostering social cultural, educational and environmental programmes – on this issue, reference is made to Chapter 4 "The Mota-Engil Commitment to Affected Communities", Social Responsibility Policy;
- ✓ To mitigate the adverse effects by adopting wherever possible, both preventive and corrective measures to ensure that biodiversity, health and safety of local communities are preserved;
- ✓ Compensation, whenever applicable (i.e. any time it falls upon the Group) should seek fair and respectful solutions for unintentional rehousing – on this issue, reference is made to Chapter 4 "The Mota-Engil Commitment to Affected Communities", Social Responsibility Policy;

Managing community relations is pivotal and driven by two major building blocks:

- ✓ To prevent and firmly solve social conflicts through active listening and transparent dialogue.
- ✓ To promote local development through hiring local labour and local suppliers, to invest in training its local staff, corporate volunteering (check Chapter 3.2.3 – Volunteering – Social

Responsibility Policy and Chapter 3.2.1 – dealing with the Manuel António da Mota Foundation (FNAM) – Social Responsibility Policy whenever that becomes crucial and is in line with the Group’s Social Responsibility Policy.

This commitment is transversal to all geographies where the Mota-Engil Group operates, reflecting our ambition to be a reference partner with the communities and to contribute to a fairer, more resilient and sustainable society. Abiding fully by our [Human Rights Policy](#) and adopting the best labour practices has become our cynosure, beefing up our contribution to inclusion, equity and valuing of human assets.

## 2. SCOPE

All business units, including their companies and projects wherever the Mota-Engil Group operate shall be bound by this policy.

## 3. MOTA-ENGIL’S COMMITMENT TO COMMUNITIES

The Mota-Engil Group reaffirms its commitment to support and develop the communities in countries where the Group has taken root.

By resorting to the double materiality assessment, which meant collaborating with a number of both internal and external stakeholders, the Group ensures representation of communities in establishing its strategic goals, therefore fostering an inclusive approach attuned to its central priorities as indicated in the Strategic Plan applied at all times and consolidating its active role in building fairer and more sustainable societies. Consequently, the Mota-Engil Group vows to work with local communities (see Chapter 4 “The Mota-Engil Commitment to the Communities” within the Social Responsibility Policy) implementing the Sustainable Development Goals:

- 1 Eradication of poverty;
- 3 To ensure access to good health and promote well-being for all age brackets
- 4 To promote quality education;
- 5 To contribute to gender equality;

- 8 Dignified jobs and economic growth;
- 10 To reduce inequalities;
- 12 To promote a circular economy;
- 13 Promote and foster climate action, and
- 17 To promote partnering among its stakeholders for the Sustainable Development Goals.

The community-based intervention aims at:

- ✓ Sustainable local development: through hiring local labour, local goods and services providers, and implementing proper social programmes.
- ✓ Social conflict prevention and solving: To implement social programmes strategic alliances will be promoted with the communities, civil society organisations, public entities, and our customers and suppliers through collaborative and assertive approaches.
- ✓ Promoting better living conditions: this includes health, safety, education, and well-being in line with the Human Rights Policy, the Social Responsibility Policy and the [Group's Safety, Health, Environment and Quality Policy \(SHEQ\)](#).
- ✓ Protecting cultural and environmental heritage: by preserving ecosystems and respecting local traditions (see Chapter 4. "Mota-Engil Commitment to Communities" in Social Responsibility Policy).
- ✓ Strengthening strategic alliances: with civil society entities, the public sector, customers and suppliers.

## 4. GOALS AND PRINCIPLES OF PROTECTION AND WORK WITH COMMUNITIES

### 4.1 Guiding Principles

Mota-Engil Group engagement with communities is guided by principles ensuring ethical, transparent and sustainable relations:

- ✓ Respect for human dignity: this includes the Group's employees or any other services providers (subcontractors, consultants or others from the value chain), their families, and members of local communities (Chapter 3.1. "Social Responsibility Goals" – Social Responsibility Policy).

- ✓ To promote inclusion and equity: valuing cultural and social features of each territory.
- ✓ To protect local vulnerable groups and indigenous peoples within communities: such groups require special care, and they should be listened and their rights respected; likewise, their specific needs should be grafted in the consultation process, planning and social-based intervention.
- ✓ Active participation and listening: communities are involved as relevant stakeholders by resorting to continuous dialogue and listening mechanisms (Chapter 4. "The Mota-Engil commitment to communities" – Social Responsibility Policy).

Corporate social responsibility: in line with the Sustainable Development Goals (SDGs), to promote a positive impact and mitigate negative impacts as far as the Group's Social Responsibility Policy is concerned (Chapter I Framework and Purpose" – Social Responsibility Policy).

#### **4.2. Proper consultation mechanisms, reporting and management of complaints and concerns (*grievance mechanisms*)**

- ✓ A complaints management system (*grievance mechanisms*): a system, communities within which the group operates can access, which is aligned with transparency and accountability principles and abiding by the best practices implemented and shared by the World Bank Guidelines, the IFC, the OECE and the UN Guiding Principles.

### **5. COMMUNITIES LIAISON OFFICER (CLO)**

#### **5.1. Appointment and role of the CLO**

The *Community Liaison Officer* (CLO) is the executive in charge to ensure effective, transparent and continuous communication between the Group and the local communities. The role of a CLO is to facilitate trustworthy communication, to mitigate social risks and ensure that the communities' concerns and expectations are addressed throughout the entire project life cycle.

The profile, role and responsibilities of the CLO will be established on a case-by-case basis, bearing in mind the job description set out by Corporate Human Resources and market/project

requirements.

The applicability of the CLO role depends on the local context, the size and nature of the project, as well as the level of anticipated and expected interaction with communities. It should be noted that, after the risk and impact assessment of the project or company and any contractual/legal requirements, the need to appoint a CLO may be established as a mitigation measure. Where there is less community involvement, the role can be taken up by an employee with proper training or integrated into other operational duties, in line with the functional description established by Corporate Human Resources.

## **5.2. Main Responsibilities and on-the-job training**

Without prejudice to the above, the CLO shall have the responsibilities/duties required by a given market/project.

Among others, CLOs may be required to take up following duties:

- ✓ To establish and maintain communication channels with local communities, such as local vulnerable groups and indigenous peoples.
- ✓ To identify social and environmental impacts of ongoing projects.
- ✓ To ensure the grievance management follow-up.
- ✓ To ensure that the Group's in-house policies are complied with and that legal and contract requirements are met.
- ✓ To collaborate with in-house teams (namely Human Resources, SHEQ, Sustainability and Compliance) to achieve aligned action plans.

## **6. GRIEVANCE MECHANISMS**

The Mota-Engil Group recognises how important it is for local/involved communities to voice their interests and concerns, therefore promoting a participatory approach. Accordingly, the Group provides a number of tools, emails, tailored applications and physical suggestion/complaint boxes or contact persons (DHC, Human Resources, SHEQ, CLO); the aim is



to ensure that transparent, effective and easy to access ways for interested parties to voice their concerns, report complaints and seek timely solutions. For further information, check the Guide dealing with grievance mechanisms and the various types of complaint management for communities involved in the Mota Engil Group's operations, scope and suggested treatment.

The tools referred to are also meant to provide the Mota Engil Group's workforce a way to report their concerns over the workplace.

The Mota-Engil Group also underwrites to promptly address the issue by prioritising the concerns voiced through available pathways and involving the relevant stakeholders (local, regional, national and supranational) depending on the seriousness of the issue; therefore it will try to ensure a prompt and proper review level to avoid delays and guarantee that decisions are always made by the relevant authority and are aligned with the [Code of Ethics and Business Conduct](#) and the [Whistleblowing and Non Retaliation Policy](#).

Wherever mandatory, and on a case basis, the Mota-Engil Group will adopt or adapt internal procedures to ensure that specific requirements set out by projects funded by multilateral agencies, the World Bank or any other relevant stakeholder, for instance, are complied with. The Group will act likewise in connection with domestic or international legal requirements whenever such legislation prevails over the Group's in-house rules.

With a view to increased availability and whenever possible, the Mota-Engil Group will translate and localise the contents of the major principles of the grievance mechanisms bearing in mind literacy levels.

The Mota-Engil Group will adopt the measures needed so that the grievance mechanisms are known to all stakeholders through awareness campaigns and providing training to such stakeholders.

The Mota-Engil Group will prepare regular reports on types of claims or concerns, the treatment workflow and the outcome, and corrective measures where applicable.

## 7. FINAL CONSIDERATIONS

Within the framework of its *modus operandi*, issues relating to local communities involved

in the Group's business operations are engrafted in the company's Risk Management Policy.

The Mota-Engil Group undertakes to ensure that affected communities are involved in a transparent and collaborative manner in preserving biodiversity and ecosystems in line with the Social Responsibility Policy principles and Group's sustainability commitments.

The Mota-Engil Group recognises the global scarcity of resources and undertakes, for instance, to take action to avoid using excessive water and anticipate the adverse effects on the communities.

The Mota-Engil Group recognises how crucial it is to secure the safety and health of the communities by taking action to avoid or minimise the exposure to risk and danger, or to anticipate such situations whenever possible by adopting plans to avoid or minimize the exposure to potential risk and danger for those communities involved.

The Mota-Engil Group is aware of the involuntary rehousing issue and whenever possible seeks to avoid community displacement if that falls within its scope of action. In the event that is not feasible, yet expressly indicated as falling within Mota-Engil Group's responsibility under a contract, we undertake to participate in all stages of the rehousing process and ensure fair compensation and available, transparent grievance mechanisms.

The Mota-Engil Group is aware that Indigenous People exist and promotes both internally and externally, their involvement at the initial stages of any project, by mitigating or compensating, or both, for any impacts, always with respect for their cultures.

The Mota-Engil Group is committed to protect and acknowledge cultural heritage and ensure the continuous access of communities to their places of cultural value, abiding by the local guidelines of the authorities that regulate these subjects, whenever they exist.

## **8. INTERNAL AND EXTERNAL REFERENCES**

### **8.1. External References**

This policy took into account the best practices shared by the Guidelines of the International Labour Organization, the United Nations (UN), the Organization for Economic Cooperation and Development (OECD) and the International Finance Corporation (IFC), in line with its commitment

already enshrined in the Human Rights Policy.

## 8.2. Internal References

This Policy is attuned to and fits the goal established by the [Group's Integrity and Compliance Programme](#), which aims to holistically bring together all intrinsic features of the Mota-Engil Group's business values and applies to all employees, consultants, contractors and subcontractors, wherever it operates the world over.

## ANNEXURE I | DEFINITIONS

**Commitment:** agreement, arrangement, pact, through which the company undertakes to donate goods, services, money or act in any other means in favour of the community.

**Communities** a group of people sharing common features or interests. A community may be a geography-based group of people, or a group with share interests or a common demographic composition, independent of their physical location in a country<sup>1</sup>.

**Affected Communities:** people or groups of people living or working in affected areas or areas that may be impacted by the organisation's business operations.

**Indigenous Communities:** the expression "indigenous peoples" is used in a generic way to refer to a distinct social and cultural group presenting following features with varying degrees<sup>2</sup>:

- Self-identification as members of a distinct indigenous cultural group and the recognition of such identity by others;
- Collective bond to geographically distinct habitats or ancestral territories in the project area and to the natural resources of those habitats and territories;
- Customary cultural, economic, social or political institutions separate from those of the dominant society or culture;

**Local Communities:** all land-dependent communities. While communities vary in size, identity, internal equity and land-use systems, they all share strong bonds to their land and distribute rights according to the rules they themselves create<sup>3</sup>;

**Compensation:** this will also guide and monitor the Mota-Engil Group's business activities by establishing hierarchies in the social, environmental and economic building blocks with following priorities: generating a positive impact, mitigating adverse effects and promoting corrective solutions to replace those impacts.<sup>4</sup>

**Community Engagement:** a process of working with groups and traditional leaders, community leaders, civil society and government leaders, and opinion leaders to facilitate their active

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<sup>1</sup> United Nations Educational, Scientific and Cultural Organization (UNESCO)- Instruction manual for completing the questionnaire on research and experimental development (R&D) statistics (2012)

<sup>2</sup> IFC Guidance Note 7 Indigenous Peoples

<sup>3</sup> Oxfam. (2016, 2 March. Common Ground: Securing land rights and safeguarding the earth [Briefing paper]. Oxfam International; International Land Coalition; Rights and Resources Initiative. <https://oxfamlibrary.openrepository.com/bitstream/10546/600459/1/bp-common-ground-land-rights-020316-en.pdf>

<sup>4</sup> Dicionário de língua portuguesa e dinâmica de contexto [Portuguese Dictionary and contexto Dynamics]

participation in addressing those issues that affect their lives. Community engagement empowers social groups and social networks, building local strengths and capacities and increasing local participation in finding adaptable and accountable solutions. Through the principles and strategies of community engagement, all stakeholders have access to processes for evaluating, analysing, planning, leading, implementing, monitoring, and evaluating actions, programmes, and policies that will promote the survival, development, and protection of community members.”<sup>5</sup>

**Materiality:** Materiality analysis is the process that serves as a starting point for sustainability reporting under the new CSRD Directive and ESRS Standards. It is meant to identify and assess the most relevant impacts, risks and opportunities for the organisation and its stakeholders, those being the issues to be reported. A material issue is one that can significantly influence decisions, actions, and performance of the organisation or its stakeholders, in the short, medium, or long run. This information should be meaningful enough to explain the issues at stake, meeting the expectations of transparency of both the organisation and the general public, and supporting informed decision-making. As part of its materiality analysis, the Mota-Engil Group mapped all its stakeholders, identifying the affected communities as a crucial stakeholder for its operations. Recognising the importance of these communities, the company listened to them through surveys and proxies, both internal and external, with the aim of collecting, complementing and reinforcing the understanding of their concerns and expectations, ensuring that they were properly considered in the process of analysis.

**Grievance:** expression of discontent, discomfort, annoyance, etc. by a member of the Community Interest Group because of the direct or indirect activities within the operation. The cause is motivated by a fact or relationship presented by the complainant around which he seeks an answer or solution. Attempts will be made to refer to the formal procedure of complaints and concerns applicable on the construction site; therefore, the situation referred to must be based on sustainable grounds to be admitted and the complainant/claimant must be identified. The complaint/claim may be submitted either individually or collectively, and claimants must be identified and submit justifiable motives.

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<sup>5</sup> UNICEF: Community Engagement. Partnering with communities enabling them to lead the change process.

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