
MOTAENGIL

A World of Inspiration



Code of Ethics and Business Conduct

Adopted • 2015

Current version • 07/10/2019



Code of Ethics and Business Conduct

Message from the President

Dear Colleagues,

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.

This **Code of Ethics and Business Conduct** (“Code”) provides an overview of our fundamental business values, which are based on our business ethics and our commitment to integrity. It applies to every member of our staff, directors, consultants, contractors and subcontractors, and to our subsidiaries worldwide. It summarizes some of our most important principles and policies. This Code should be applied together with the laws and regulations governing the jurisdictions where we operate.

The content of the Code is not new. The policies set out in the Code are part of Mota-Engil Group’s long tradition insofar as our adoption of ethical business standards is concerned. You should read the Code carefully and ensure you understand its contents, the consequences of non-compliance, and the importance of the Code for our Group’s success.

If you have any questions, contact your line manager, the Group’s Compliance Helpline¹ or any of the other people identified in this Code. If you have any query about whether a particular practice or issue is recommendable or appropriate, you should seek proper advice.

We all share the responsibility for safeguarding the principles of this Code and for promptly drawing attention to any violations or potential violations that may occur. If our Group is to provide staff with a healthy workplace and an excellent working environment, it is essential that everyone is aware of these matters, that every question is answered and that every difficulty is addressed and resolved.

Yours sincerely,

António Mota
[Chairman of the Board of Directors](#)

¹ compliance@mota-engil.com



Code of Ethics and Business Conduct

1.

OUR CODE OF BUSINESS CONDUCT

1.1 Object

Mota-Engil SGPS, S.A., its subsidiaries, branches and affiliates (the "Group") undertakes to carry out its business activities and relationships with dedication, commitment, professionalism and integrity.

The purpose of this Code of Ethics and Business Conduct ("Code") is to establish the basis of a responsible behavior, duties and general rules of ethical and business nature that should rule the conduct of all Group employees and managers regarding the performance of their jobs, complying with the Vision, Mission and Values that integrate our organizational culture.

Our Group's business ethics is based on complying with several criteria that promote the Group's values, culture and management model and foster respect for individuals and their rights.

This Code's aim is to establish and release the principles and rules that guide our Group and constitute the basis of the behavior that the Group expects from its employees.

This Code besides implementing and promoting a culture of ethics and compliance focused on the Group's sustainability as basic function for the business perpetuity, allows the Group to share its values with the goal of promoting its credibility and reputation.

The multisector nature of the Group activities and its presence in different geographic contexts, justifies the formalization of rules of business culture as an instrument to strengthen the collective consciousness between employees and foster a homogeneous culture shared by everyone.

This Code comes into force in 2015 and may be updated periodically by the Mota-Engil, SGPS, S.A. Board of Directors ("Board").

1.2 Implementation scope

The Code applies to all individuals working for the Group at any level and in any category. This means it applies to senior and middle management, directors, other employees (permanent, fixed-term and temporary), consultants, contractors, subcontractors, providers, trainees, overseas personnel, casual, interim and home workers, volunteers, interns, agents, sponsors or any other person associated our Group or with its management, directors and employees, irrespective of their location.

The Group similarly hopes that its partners will be aware of the Code and abide by the same standards in their relations with the Group and other representatives of the Group.

Everyone should abide by this Code in the course of their day-to-day duties since it establishes the behavioral model coherent with our Group's business culture. Therefore, whenever the expression "Employee" is referred in this Code it includes everyone defined in this point 1.2.



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1.3 Connection with the Code and other Company policies

This Code should be interpreted in conjunction with any other Group policies mentioned in it, such as the Integrity and Compliance Program and with any additional policies, rules and procedures that the Group may adopt from time to time, made available at the Corporate Portal.

1.4 Monitoring and compliance

The Compliance Corporate area depends on the Executive Committee of Mota-Engil, SGPS, S.A. and reports to an independent director, that will have the responsibility to validate all procedures applicable to the system and validate all future changes presented, and they have to under any circumstance be approved by the Board.

The independent director has autonomy and enjoys protection against arbitrary penalties, guaranteeing exemption and freedom of analysis required when treating these issues.

Our Group is committed to comply with this Code and to apply the principles set forth in it to all of our dealings with shareholders, partners, clients, suppliers, employees and the community.

It is the duty of the Mota-Engil, SGPS, S.A. Executive Committee, senior managers, and operative managers to set the example, provide guidance and support their teams in complying with this Code.

The constant monitoring allows to identify errors or failures and allows its correction and improvement of the policies adopted.

Therefore, the Group collects information from various sources, such as whistleblowing channels (webpage, e-mail address, telephone, etc), and compliance help line. This data is analyzed and when in presence of irregularities, countermeasures and penalties are suggested to be applicable.

That information is converted into reports, allowing to follow-up on results and assess the implementation of the policies mentioned in this Code.



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2.

VISION / MISSION / VALUES

2.1 Vision / Mission / Values

Our Vision

To be an international reference in the sector where it operates, aligned with the best market practices on a production level, with a permanent innovation, assuming thus a strong identity, recognized in technical skills by providing a service of excellence to its clients and to the community.

Our Mission

Create shareholder value respecting the community and the future, in a socially responsible way.

Our Values

Recognizing that the construction of a strong identity and culture is determinant to implement the challenges set, the Mota-Engil Group shares with its stakeholders the following values:

AMBITION

Eagerness always renewed of doing more and better, facing the present and future with boldness and confidence and assuming, in a determined and committed way, new challenges that contribute to the growth of the Group.

INTEGRITY

Choose the path which reinforces the principles of honesty, truth, loyalty, righteousness and justice, in the daily conduct of everyone.

COHESION

Guarantee that the goals set, which are intended ambitious, are reached through the contribution of all business units and that the vitality of the Group results from combining wisdom and strength necessary to overcome new challenges.

GROUP SPIRIT

Consolidate the sense of belonging, respect for the differences, loyalty and reciprocity in a global and culturally diverse context, maintaining pride in the past and strengthening the confidence in the future.

3.

OUR RESPONSIBILITIES AT WORK

3.1 Compliance with laws, rules and regulations

The Groups respects all laws, rules, regulations and professional standards, in all areas, applicable in the country where you are working or in which the Group operates.

Regarding anticorruption and bribery laws, money laundering and terrorism financing, the Group abides to national and international legislation, prominently the Foreign Corrupt Practices Act – FCPA and UK Bribery Act as well as guidelines issued by intergovernmental bodies such as Organization for Economic Co-operation and Development – OECD and the FATF - Financial Action Task Force.

3.2 Company governance

Our Group will be managed transparently and in compliance with the standards, guidelines and principles of good corporate governance, in accordance with our commitment to our shareholders, partners, clients, suppliers, employees and the community.



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3.3 Conflicts of interest

It is your responsibility to ensure that you act in the Group's best interests and that you do not act in any way that would jeopardize that responsibility.

A conflict of interest² occurs when your personal interests³ interfere with those of the Group. A situation of conflict could occur if you undertake actions or have interests that make it difficult for you to carry out your duties objectively and effectively. You must perform your duties in an honest and ethical manner, including the way in which you deal with real, apparent and potential conflicts of interest between your personal and business relationships. This includes fully disclosing any real, apparent or potential conflict of interests as defined herein.

If you believe that there might occur a conflict of interest or that an activity or relationship in which you are involved could constitute a conflict of interest, you should inform the Group's Ethics Hotline⁴ and your line manager. You should be especially careful if you have a direct or indirect interest in a company or have the capacity to influence a company with which our Group has a business relationship, or which is one of our competitors. This applies whether the interest in question is yours personally or due to another person related to you. For the purposes of this Code, a "related person" is understood to mean your spouse, partner or significant other, child, parent, sibling, cousin, close personal friend or any other person (including agents) who may be entitled to act on your behalf. For example, a conflict of interest may also occur when one family member is directly subordinate to another.

3.3.1 Relatives working in the sector

You may face a situation in which a close relative is a competitor, supplier, or a Group customer, or is one of their employees. Such situations are not necessarily prohibited but they should be handled with greater sensitivity regards to security, confidentiality, and conflicts of interest. You should take the nature of your own responsibilities as a Company employee into account, as well as the nature of the other person's responsibilities; and, similarly, the access each has to their employer's confidential information. Such a situation could raise suspicions among your colleagues and could affect your professional relationships and your reputation for ethical behavior.

Consequently, you should inform the Compliance Helpline of any such situation so that the nature and scope of any potential conflict can be assessed.

² A "conflict of interest" occurs when the direct or indirect personal interest of a given employee influences, or has the capacity to influence, the proper performance of his or her professional duties, and which causes, or has the capacity to cause, a conflict between the employee's personal interests and the rights and interests of the Group, with potentially harmful results for the Group's rights, interests, property and/or reputation.

³ An employee's "personal interest" is understood to mean a situation where an employee may have the opportunity, in the course of his or her duties, to obtain personal gain (or to mitigate a potential personal loss). Such situations may involve monies, valuables or other goods or services and/or other property rights, whether for the employee, his or her family or third parties.

⁴ etica@mota-engil.com



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3.3.2 Corporate opportunities

You must promote the Group's legitimate interests whenever an opportunity arises. If you become aware of a business or investment opportunity in which the Group could be interested, or which in some other way comes within the scope of our business activity, you must not attempt to profit from, or engage in, that opportunity without the prior written consent of the Group's Compliance Helpline. You may not use corporate property or information, or your position in the Group, for undue personal gain. Similarly, you may not engage in any activity as a competitor of the Group.

3.4 Corruption and bribery

Our Group has a zero tolerance policy with regard to both active and passive corruption and bribery and is committed to complying with the relevant anti-corruption and anti-bribery legislation in every jurisdiction where we operate.

Please refer to the Group's Anti-Corruption and Bribery, Anti-Money Laundering and Counter-Terrorist Financing Policy that sets out your responsibilities in relation to ensuring compliance with applicable anti-bribery laws, rules and regulations.

Please refer to our Group's Anti-Corruption and Bribery, Anti-Money Laundering and Counter-Terrorist Financing Policy for further details.

3.4.1 Offers, gifts and hospitalities

You must not give, promise to give, offer or accept any payment, gift or hospitality in the expectation or hope of being granted or achieving a business advantage or to reward someone for a commercial advantage already granted.

Please refer to our Group's Anti-Corruption and Bribery, Anti-Money Laundering and Counter-Terrorist Financing Policy for further details.

3.4.2 Relations with the Government and authorities

Concerning public politics, the Group does not usually adopt any position, directly or indirectly, or contribute in any way to political organizations.

Our Group is obliged to comply with all national and international legislation in force in any country where it operates. You must not give, promise to give or offer payments, gifts, or hospitalities to a public official in order to facilitate or expedite any business activity.

Please refer to our Group's Anti-Corruption and Bribery, Anti-Money Laundering and Counter-Terrorist Financing Policy for further details.



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3.5 Money Laundering and Terrorism Financing

Our Group is committed with the fight against money laundering and terrorism financing, preventing and avoiding anyway of the Group be used in illegal activities, as well as avoid any other activity that doesn't fit within the legislation applicable in all jurisdiction where it operates.

Please see the Group's Anti-Corruption and Bribery, Anti-Money Laundering and Counter-Terrorist Financing Policy that establishes its responsibilities regarding the compliance of laws, rules and applicable regulations.

3.6 Relations with Clients, Suppliers and Service Providers

You should take measures that will help ensure that the Group only maintains business relationships with companies and individuals who acknowledge this code and have the same standards of compliance and integrity that we do.

You must refuse any business relationship and must not provide any assistance to anyone who adopts illegal practices. You must report any violation of this principle to the Group's Ethics Hotline

Please refer to the specific requirements of third party due diligence procedures, namely the "Third Party Procedure" internal standard mentioned in our Group's Anti-Corruption and Bribery, Anti-Money Laundering and Counter-Terrorist Financing Policy.

3.6.1 Relations with clients

You must act professionally and efficiently in order to deliver excellent, high-quality service that will help maintain and strengthen our Group's relationships with its clients and enhance our strong image and reputation.

3.6.2 Relations with suppliers and service providers

Our Group will choose its suppliers and service providers independently and objectively, based on market conditions, service quality and cost criteria.

Our Group's negotiations must be conducted on good faith and integrity basis and in respect of the contractual obligations to which we have committed.

3.7 Relations with the Media

If you are not one of our Group's official spokespeople, you may not speak to the press, stock-exchange analysts, other members of the financial community, shareholders, groups or organizations, either as a representative of the Group or about Group activity, except when you have been specifically authorized to do so by a member of the Executive Committee. Requests for financial or other information about the Group from the media, press, financial community, shareholders, or the public must be addressed to press@mota-engil.com

Any information given to the media and publicly disseminated must be informative and true.

Any public information generated and communicated by the Group must comply with all the applicable legislation and regulations in force. Any public financial information about the Group must present its financial circumstances for a given date or period in a complete, precise and trustworthy manner, and must have been prepared within the applicable time period.



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3.8 Relations with the community

3.8.1 Human Rights

Our Group recognizes the Human Rights in all cultural, socioeconomic, and geographic contexts where it operates, respecting the respective traditions and cultures and promoting support for local communities in accordance with the specific interests of each region.

3.8.2 Child labour

Our Group prohibits any situations which involve or may be related to child or forced labour.

3.8.3 Social responsibility

Our Group is strongly committed to pursuing and strengthening its strategy of ethical, social, and environmentally responsible management. Our corporate social responsibility program includes the following general goals:

- (a) Value creation based on the best international practices;
- (b) Eco-efficiency and innovation;
- (c) Environment protection;
- (d) Corporate ethics;
- (e) Dialogue with the stakeholders;
- (f) Human capital management; and
- (g) Support to Social Development.

Our Group is committed to contributing to a fairer and more prosperous society, rendering compatible economic growth, social cohesion, and environmental protection, and thereby simultaneously ensuring a better quality of life for the present and future generations.

4.1 Company Assets

This Code requires that we protect our Group's assets⁵ and ensure that they are used efficiently for legitimate business purposes. Theft, negligence and waste all have a direct impact on the Group's profitability. You should take measures to prevent against damage, theft, or improper use of Group property. If you leave our Group, you must return any and all of its property that may be in your possession. Unless specific authorization has been given otherwise, Group assets, including equipment, materials, resources and intellectual property, must only be used for the Group's business purposes. You will look after Group funds and property as if they were your own, safeguarding them against improper use, loss, fraud or theft.

4. PROTECTION OF THE COMPANY'S RESOURCES AND INFORMATION

⁵ "Assets" are understood to be property, funds, information or intellectual property held by our Group, as well as equipment assigned to the employees, such as mobile phones and computers.



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4.2 Company accounting records

Our Group must record all of its financial activities in accordance with all the applicable laws and accounting standards. All transactions must be duly authorized and recorded fully and precisely. It is strictly forbidden to record or document false or misleading information. You must never create false or misleading reports or make payments or create accounts on the Group's behalf on the understanding that part of the payment or account will be used for a purpose other than the one described in the corroborating documents.

If you become aware, or suspect, that someone has falsified Group accounts, you must report it immediately to your line manager or to the Group's Ethics Hotline. Concealing information from the management or from internal or external auditors could seriously prejudice our Group.

4.3 Record keeping

Our Group is committed to complying with the laws and regulations applicable to record keeping. All records shall be kept for no less than the minimum time period established in those laws and regulations.

All records that are irreplaceable and critical to the continuation of our Group's business must be identified and stored in a safe place at the Group's premises. This would include such items as: accounts receivable and accounts payable, active clients lists, bonds, notes, shares, company articles of association, minutes and associated records, internal memorandums, company approvals and resolutions, mortgages, originals of signed contracts, payroll records, and discs and cassettes containing back-up copies of data. These records and documents, which bear the signatures of the top-level directors of the Group, must never be destroyed.

4.4 Confidential information

In the course of your work at our Group, you may become aware of facts about its activity, plans, operations, or trade secrets that are not known to the public or to our competitors. Confidential information includes all non-public financial, technical, operational, commercial, and personnel-related and management information, as well as other information, data and expertise.



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You must not disclose any information entrusted to you by our Group or its suppliers or clients, except if the Group has authorized you to do so or if you are required to do so by law. If you believe you may have disclosed confidential information, for example, by sending an e-mail to the wrong person or by leaving documents in a public place, you must immediately inform your line manager or the Group's Ethics Hotline.

Your obligation to treat information as confidential does not end when you leave the Group. When your employment contract ends, you must return everything in your possession that belongs to the Group, including all documents and other materials containing confidential information belonging to the Group and its clients or suppliers. You may not disclose confidential information to a new employer or to anyone else when you cease to be an employee of the Group.

All non-public resources and assets made available to you by our Group are Group's property and you may not use them for your personal benefit or private use.

4.5 Prohibition of insider trading

Our Group obeys and complies with the laws relating to securities, ensuring that insider information is secure and protected.

Insider information is information of a precise nature that is not made available to the general public and which is related, directly or indirectly, to our Group or to our Group's securities. The disclosure of such information to the general public would probably have a significant effect on the price of our Group's securities.

While performing your duties at the Group, you may obtain non-public information about our Group's suppliers, clients or other individuals or entities. You are forbidden from buying or selling securities of companies listed on a stock exchange whenever you have non-public information that could, if it was disclosed, have a significant effect on the price of our Group's securities. You are also forbidden from passing on this type of information to anyone who may buy or sell securities, a procedure known as "tipping".

4.6 Economic sanctions and embargoes

Our Group complies with national and international sanctions applicable to its activity. To this end, our Group evaluates all counterparties, new and current, by consulting applicable sanctions lists, including the List of Specially Designated Nationals and Blocked Persons and the Sectoral Sanctions Identification List issued by the US Treasury Office of Foreign Assets Control (OFAC) and the EU list of specially designated persons.



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5. FAIR PRACTICES

5.1 Prohibition of unfair practices

You must commit to acting fairly in your dealings with the Group's clients, suppliers, competitors, and employees. You must never take unfair advantage of a third party by means of manipulation, concealment, use of insider information, imprecise presentation of material facts or any other unfair practice.

5.2 Competition laws

Our Group strictly complies with all applicable competition laws. These laws are highly complex, and matters related to competition should not be addressed without consulting the Legal Department. Any violation of the competition laws could lead to both the Group and yourself being held responsible. It would be impossible to include all of the relevant legislation here in this Code, but we have provided below a general overview of the types of conduct that should be avoided. If you are involved or become involved in activities similar to those identified in this Code or if you detect situations which, in your opinion, could raise questions of competition, you must immediately consult the Compliance Helpline for further guidance.

5.2.1 Conspiracy and collaboration between competitors

Competition laws promote and preserve the independence of each competitor in their decision-making on prices, production and other competitively sensitive factors. Competition laws are infringed when competitors enter into agreements which limit the independence of decision-making and restrict market operations. Such agreements could include price-fixing, restriction of production or quality control of the products or the division of the market by clients, territories, products or purchases. You must never enter into any agreement with any competitor about any of these topics in view of the fact that such agreements could potentially be illegal.

Illegal agreements do not necessarily have to be set down in writing nor even express mutual commitments or guarantees. They may be based on casual conversations, informal discussions or merely exchanges of information between competitors that could lead to price-fixing or some other adjustment. Any communication with a competitor's representative, however harmless it may appear at the time, may later be subject to legal scrutiny and constitute the basis of charges of improper or illegal conduct.

In order to avoid improper agreements, our Group forbids:

- (a) Conversations and contacts with competitors about prices, costs or terms and conditions of sale;
- (b) Conversations and contacts with suppliers and clients that unfairly restrict market operations or exclude competitors from the market;



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- (c) Agreements with competitors relating to the allocation of markets or clients;
- (d) Agreements with others with the aim of boycotting clients or suppliers; and
- (e) Any unfair use of our Group's position in the market.

5.2.2 Gathering of information about the Company's competitors

It is entirely legitimate for our Group to gather information about the market, including information about our competitors and their products and services. However, there are limits to the ways in which such information may be obtained and used. When gathering information about competitors, you must follow these guidelines:

- (a) Gather information about our Group's competitors from sources such as published articles, advertisements, brochures, other non-proprietary materials, consultancy surveys and conversations with our Group's clients.
- (b) Never try to obtain a competitor's trade secrets or any other proprietary information using illegal means such as theft, espionage, bribery or violation of a competitor's non-disclosure agreement.
- (c) If there is the slightest indication that the person/entity who has the information in their possession did not obtain it legally, you must refuse it. If you receive any information about competitors from an anonymous source or which has been flagged as confidential, you should not examine it and you must contact the Group's Ethics Hotline immediately.

6.1 Respect, integrity, loyalty and team spirit

The relation between employees must be based on mutual respect, loyalty and rectitude, in observance with the principles of ethics and cooperation, contributing to a good working and team environment. Everyone who works for our Group must contribute towards the creation and maintenance of an environment in which we can all feel respected and valued. Supervisors and managers, in particular, are responsible for promoting a working environment that promotes honesty, integrity, respect and trust.

You should be tolerant and respectful of cultures, opinions and lifestyles that are different from your own, always taking into consideration the effect your behavior may have on your colleagues and other parties.

Discriminatory behavior, intimidation, harassment and physical aggression are strictly forbidden in the workplace. Intimidation in the workplace is the unacceptable singling out of a particular employee from among his or her colleagues that could result in a limitation of that employee's rights or cause him or her to feel intimidated.

6. **OUR WORKING RELATIONS**



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6.2 Protection of employees' personal data and privacy

Our Group collects and stores personal data related to the employment relationship between the Group and its employees. Only the personal data required by law and necessary to ensure the effectiveness of the Group's operations is collected and stored. The Group assures the employees' entitlement to review and correct their personal data, in strict adherence to applicable laws and regulations.

The personnel responsible for maintaining personal data (whether it is employees' personal data or any other counterparties' personal data which our company has operations with) and those who have been granted access to this information must not disclose, must not utilize it to any purpose, different from the ones defined by the Group; to do so could constitute a violation of the applicable legislation or a breach of the Group's personal data protection policy. Access to personnel records must be restricted to those who have appropriate authorization and a clear work-related reason for accessing them.

6.3 Equal opportunities and non-discrimination

As an employer, the Group operates a policy of equal opportunities with regard to hiring and promotion practices, benefits and salaries. The Group will not tolerate any discrimination whatsoever against any person on the basis of their ethnicity, religion, color, gender, age, marital status, nationality, sexual orientation, citizenship or disability (when the applicant or employee is qualified to perform the essential duties required for their position, with or without reasonable conditions) or for any other reason prohibited by law. The above applies to recruitment, contracting, assignment, promotion and any other condition of employment. You are entitled to equal opportunities and fair treatment based on merit.

The Group will not tolerate the use of discriminatory reprimands, nor any other remarks, jokes or conduct liable to cause or foster an offensive or hostile working environment.

6.4 Sexual and other types of harassment

The Group strictly forbids any form of harassment in the workplace, when accessing and while executing the work or training contract.

Under the terms of this Code, harassment is understood as any undesired behavior, gesture, word, attitude, active or omissive that, regardless the factors of illegal discrimination, having as goal or result:

- (a) has the aim or effect of creating an intimidating, hostile or offensive work environment;
- (b) has the aim or effect of unreasonably interfering in an individual's performance of his or her duties; or
- (c) affects the contracting of an individual in any other way.



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It is sexual harassment all undesired behavior of a sexual nature, verbal or non-verbal, physical or other, with the goals or effects described in the previous paragraph.

Without prejudice of the compensatory consequences, the Group will establish the competent disciplinary procedure whenever it is aware of alleged situations of harassment in work context.

The complainant of the harassment and witnesses indicated by the latter can't be disciplinary punished (except if they do so knowing the allegation is false and with the sole intent to harm the complaint's target and/or Group, neither to be harmed in their status or exercise of labor and civil rights).

6.5 Safety in the workplace

The health, safety and protection of our employees are paramount for our Group. The Group complies with all the rules relating to occupational hygiene and safety in the workplace, with the aim of fostering a responsible work culture in which everyone is concerned with health, safety and the prevention of occupational risks. You are personally responsible for keeping the facilities free of recognized risks and for obeying the hygiene and safety rules. Work areas must be kept clean and tidy in order to encourage operational efficiency and promote good safety practices. You must abide by the workplace safety requirements and the fire safety rules in accordance with the applicable legislation and the Group's internal procedures.

If you detect any circumstance that could be dangerous to health or safety, you must report it to the HR Department.

6.5.1 Drugs and alcohol

- (a) Except for approved Group events, you are not allowed to have alcohol in your possession or be under the influence of alcohol while you are on Group premises.
- (b) You must be conscious of the fact that you are representing our Group when you attend Group events, travel for work-related reasons or attend other business-related events. Unacceptable behavior resulting from the excessive consumption of alcohol may be treated as disciplinary offences, when appropriate.
- (c) You may not report to work under the influence of drugs or alcohol. During your working hours at the Group, or when operating or driving Group machinery or vehicles, or when you are on Group premises during your breaks, you may never use, transfer, sell, manufacture or have in your possession drugs or associated paraphernalia, alcohol or other substances which produce a similar effect. If you are taking any medication that could pose a risk to safety, you must immediately inform your line manager of this fact.

6.6 Training

Our Group has implemented a training plan that is intended to provide you with orientated, continuous technical and behavioral training that will allow you to maximize your skills and standards of excellence. Employees will receive specific training on compliance, which you must attend.

You should continually strive to improve your knowledge and develop your skills in order to achieve an excellent level of performance in your duties and help us provide our clients with the best possible service.



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6.7 Communication

Our Group seeks to facilitate communication and dialogue between employees and managers by encouraging active involvement, initiatives and consultations.

6.8 Innovation

Our Group promotes the use of technology and innovation in its business areas with the aim of maximizing the returns on its activity, promoting and encouraging the development of new ideas that bring added value.

7. INFRINGEMENTS OF THE CODE

7.1 Responsibilities

You are personally responsible for complying with the obligations of this Code. Your conduct must be governed, in all circumstances, by the principles and values set out here. Our Group has a series of resources and people at your disposal to answer your questions and assist you with difficult decisions. Failure to comply with this Code may result in financial losses, damage to our Group's reputation, or lead to you or the Group suffering criminal or civil sanctions or being held liable.

Copies of this Code are available on the Mota-Engil, SGPS, S.A. webpage.

7.2 Compliance Helpline and anti-retaliation policies

7.2.1 Group's Ethics Hotline

You may report alleged irregularities of a general, operational or financial nature and/or infringements of this Code or Group's policies at any time by contacting your line manager or the Ethics Hotline, unless applicable laws and regulations demand you report to other entities⁶. You need have no fear of retaliation if, and as long as you have acted in good faith when reporting.

All irregularity/infringement reports must be submitted by email, electronic form or written letter, to one of the following addresses:

- (a) etica@mota-engil.com
- (b) <http://www.mota-engil.com/en/ombudsman/>
- (c) Auditoria Interna – Rua do Rego Lameiro, n.º 38, 4300-454 Porto

For more information, please consult the published Whistleblowing Procedure.

⁶ This provision does not exempt the local/regional entity from forwarding the reported event to the Group's Ethics Hotline.



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7.2.2 Group's Compliance Helpline

Our Group provides a Helpline that you may use to seek guidance or raise any issues related to this Code or the Group's policies. When you contact the Helpline to ask questions, you may do so anonymously; however, by identifying yourself, you may help the Group to reply faster.

You can contact the Compliance Help Line by sending an e-mail to the following address: compliance@mota-engil.com

7.3 Disciplinary proceedings due to infringement

It is our Group's aim to make every reasonable effort to guard against the occurrence of conduct contrary to this Code and our policies and in the event that any such conduct is detected, to put a stop to it as soon as is reasonably possible.

Employees who violate this Code or any other Group policy may be subject to appropriate disciplinary procedures, which may include additional training, demotion, a reduction in salary, a warning, suspension or dismissal.

In case of any discrepancy between the English and the Portuguese version of this Code, the Portuguese version shall prevail.



MOTAENGIL

MOTAENGIL

EUROPE

PORTUGAL

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4300-454 Porto
Portugal

Rua Mário Dionísio, n° 2
2799-557 Linda-a-Velha
Portugal

POLAND

Ul. Wadowicka 8 W
30-415 Kraków
Poland

SPAIN

Campus Tribeca
Carretera de Fuencarral
a Alcobendas, n° 44,
Edifício 4 – B, n° 21
Alcobendas – Madrid
Spain

IRELAND

Enterprise & Technology
Centre, Creagh Road
Galway, Ballinasloe
Ireland

CZECH REPUBLIC

Kavčí Hory Office Park,
Building A, Silver tower, 5th floor
Na Hřebenech II 1718/10
Praha 4, 140 00
Czech Republic

SLOVAKIA

Kaštielska 4,
821 05 Bratislava
Slovakia

HUNGARY

Kopaszi Gát 5
H – 1117 Budapest
Hungary

MOTAENGIL

AFRICA

ANGOLA

Rua Joaquim Cordeiro da Mata,
n° 61-63 Bairro da Maianga –
Luanda
Angola

MALAWI

Nasra House – City Centre
P.O. Box 31379 – Lilongwe 3
Malawi

MOZAMBIQUE

Edifício Milenium Park, 14°/15°
andar Avenida Vladimir Lenine,
n° 179 2284 Maputo
Mozambique

SOUTH AFRICA

Oxford Corner
6th, 7th and 8th Floor
32A Jellicoe Avenue
West Rosebank
Joanesburgo 2196
South Africa

CAPE VERDE

Rua S. Vicente, 63, 1° andar,
Palmarejo 721 – Plateau – Praia
Cape Verde

SÃO TOMÉ AND PRÍNCIPE

Av. Marginal 12 de Julho,
n° 1011 – 167
São Tomé and Príncipe

ZAMBIA

Incito Office Park
Reed Buck Road, 45/5B
Kabulonga – Lusaka
P.O. Box 320337
Woodlands – Lusaka
Zambia

ZIMBABWE

7, Routledge Street, Milton Park,
Harare
Zimbabwe

GHANA

Movenpick
Ambassador Hotel
Suit 709 – 7th floor
Independence Avenue
Accra – Ghana

UGANDA

4, Upper Kololo Terrace
P.O. Box 8453
Kololo, Kampala
Uganda

RWANDA

Kigali City Tower Plot no. 6418
15th Floor, Avenue du Commerce,
Office 1507
Kigali
Rwanda

MOTAENGIL

LATIN AMERICA

PERU

Av. Nicolás Ayllón, n° 2634
Ate, Lima 3
Peru

MEXICO

Horacio 828 esq. Tennyson
Col. Polanco Reforma
C.P. 11550
Del. Miguel Hidalgo
Mexico, D.F.

BRAZIL

Rua Gonçalves Dias, 2316
Bairro Lourdes – Belo
Horizonte/MG
CEP.: 30140-092
Brazil

COLOMBIA

Carrera 13A-87-81
38007 Bogotá
Colombia