

# COMPLIANCE POLICY



Andrade Gutierrez S.A. (AG S.A.) is the holding company of the Andrade Gutierrez Group, which comprises Andrade Gutierrez Engenharia (AGE) and Andrade Gutierrez Participações (AGPAR).

**AGE's scope includes the processes of providing services in engineering, procurement, construction, commissioning and start-up of infrastructure, civil construction, building and industrial electromechanical erection projects carried out through its own services or third-party management.**

**And AGPAR' scope is the performance and undertakings related to the concession and/or permission of works and public services, developing and managing businesses in the infrastructure area, participating in the capital stock of important companies that operate in the concession of public services.**

The governance structure is composed of the Board of Directors of AG S.A., its support committees; the President of AGE, Business Units and Corporate Areas, and the President of AGPAR.

It should be noted that the Compliance function reports directly to the Board of Directors through the Ethics Committee, ensuring its autonomy and independence.

**For all markets in which it operates, Andrade Gutierrez S.A. considers the following to be essential for the development of its business:**

- **The strict compliance with ethical principles, including the prohibition of bribery;**
- **The management of business risks, including bribery risks;**
- **Compliance with legal requirements, including anti-bribery laws, and with the requirements of the anti-bribery management standards;**
- **Continuous improvement in the management and performance of its processes and products;**
- **Ensuring appropriate treatment for legal, ethical or conduct violations;**
- **Cultivating a positive reputation in the market and in the company in terms of Compliance and Integrity;**
- **The culture of Compliance and Integrity in the daily activities and at all levels.**

AG S.A. has ethics as the foundation of its action and relationship with stakeholders, and thus, its Code of Ethics and Conduct is applicable to all employees and partners.

As pillars, we highlight the commitment of Senior Management and the Compliance actions, including the reinforcement of culture through training and awareness.

Anyone can report violations to the Code of Ethics and Conduct and the Compliance guidelines. For confirmed cases of non-compliance with any of these items, disciplinary action and penalties will apply.

The Contact Us communication channel receives complaints or reports of misconduct, bribery, fraud or violations to the Code of Ethics and Conduct, encouraging the raising of concerns based on good faith. This channel can be accessed by anyone (employees or external public) through the Andrade Gutierrez website, the "Portal AG" intranet, or by telephone.

The Contact Us channel is operated by an external company and guarantees independent, impartial and specialized receipt of messages, as well as confidentiality and anonymity. All incidents are monitored by the Ethics Committee, and whistleblower protection is guaranteed.

**We believe it is our obligation as citizens to be in accordance with principles that strengthen transparency and ethics, while collaborating for an increasingly more just society. We reinforce this commitment on a daily basis, so that all those involved in the Andrade Gutierrez Group's operations around the world follow these same principles together.**