



POLÍTICA DE COMPLIANCE CONSAG

Construtora Andrade Gutierrez S.A. (CONSAG) is part of the Andrade Gutierrez Group, and its scope is engineering, procurement, construction, commissioning and start-up of infrastructure projects, civil construction, building and industrial electromechanical assembly carried out through its own services or management of third parties, focusing on private customers.

The Governance structure is made up of the Board of Directors, CONSAG Presidency, Vice-presidencies, Boards and executive body.

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

CONSAG has ethics as the fundamental basis of its performance and relationship with stakeholders, so its Code of Ethics and Conduct is applicable to all employees and partners.

For all markets in which it operates, CONSAG considers the following to be essential for the development of its business:

- **The strict compliance with ethical principles, including the prohibition of bribery;**
- **Bribery risk management;**
- **Compliance with legal and regulatory requirements regarding anti-bribery;**
- **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.**

As pillars, the commitment of Senior Leadership and Compliance actions are highlighted, including the reinforcement of the culture through training and awareness.

All employees, business partners or any other interested party can report any violation of the Code of Ethics and Conduct, as well as the Compliance guidelines. For confirmed cases of non-compliance with any of these items, penalties and disciplinary measures will be applied.

The Contact Us communication channel is the vehicle for receiving reports of misconduct, bribery, fraud or violations of 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, through the "Portal AG" intranet or by telephone.

Operated by an external company, the Contact Us channel guarantees the independent, impartial and specialized reception of messages, in addition to 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.