



COMPLIANCE POLICY CONSAG

Construtora Andrade Gutierrez S.A. (CONSAG) is part of the Andrade Gutierrez Group and its scope covers engineering, procurement, construction, commissioning and start-up solutions for infrastructure, civil construction, building and industrial electromechanical assembly projects, carried out through its own services or third-party management, with a focus on private clients.

The Governance structure is composed of the Board of Directors, the CONSAG Presidency, the Vice-Presidency, the Executive Departments and the executive staff.

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

CONSAG has ethics as the fundamental basis of its operations and its relationship with stakeholders, which is why the Code of Ethics and Conduct **of the AG Group** applies to all employees and partners.

In all markets in which it operates, CONSAG **has the following non-negotiable commitments in the development of its business:**

- Strict observance of ethical principles, including the prohibition of bribery;
- The management of bribery risks;
- Compliance with anti-bribery legal and regulatory requirements, **both national and international, applicable to the nature and scope of its business;**
- The continuous improvement of the management and performance of its processes and products;
- Ensuring the appropriate handling of legal, ethical or conduct violations;
- The **safeguarding of a positive reputation** in the market and in society in terms of **Ethics, Integrity and Conformity;**
- The culture of *Compliance* and Integrity in day-to-day activities and at all levels.

Noteworthy are the commitment of Senior Leadership to Compliance actions, including the strengthening of the culture through training and awareness initiatives.

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

The Fale Conosco (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 in good faith. This channel can be accessed by anyone (employees or the general public) through the website **of the** Andrade Gutierrez Group, through the “Portal AG” intranet or by telephone.

Operated by an external company, the Fale Conosco channel ensures the independent, impartial and specialized receipt of messages, in addition to confidentiality and anonymity. All incidents are monitored by the Ethics Committee and protection is guaranteed to whistleblowers.

We believe it is our duty, as citizens, to be aligned with principles that strengthen transparency and ethics, **acting with integrity and with no tolerance for bribery or undue advantages**, contributing to an increasingly fair society. We reinforce this commitment daily, so that everyone involved in CONSAG’s operations follows these same principles together.

Note: This Policy is periodically reviewed to ensure its suitability to bribery risks, the organization’s context and the continuous improvement of Compliance Management, based on the requirements of ABNT NBR ISO 37001:2025.