



OMATAPALO
GROUP

**CODE
OF ETHICS AND BUSINESS CONDUCT**

WE MAKE IT HAPPEN

CODE OF ETHICS AND BUSINESS CONDUCT

THE CODE OF ETHICS AND BUSINESS CONDUCT now published refers to the methods to be adopted by OMATAPALO Group Companies in order to comply with the objectives expressed therein.

Management is responsible for monitoring compliance with the commitments contained in this CODE at all levels.

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CODE OF ETHICS AND BUSINESS CONDUCT

CONTENTS

PRESENTATION OF THE OMATAPALO GROUP CODE OF ETHICS AND BUSINESS CONDUCT	4
1. OMATAPALO ETHICS AND CONDUCT	4
2. SCOPE OF THE CODE OF ETHICS AND BUSINESS CONDUCT	5
3. COMPLIANCE PRINCIPLES	5
3.1. We respect the laws in force and comply with standards.....	5
3.2. We are exemplary in our conduct	5
3.3. We are diligent and accountable for our performance.....	6
3.4. We report irregularities	6
3.5. We respect the Environment.....	6
3.6. We comply with Internal rules	6
4. OPERATIONAL PRINCIPLES OF THE OMATAPALO GROUP	6
4.1. Honesty and Respect	6
4.2. Rigour and Professionalism	8
4.3. Loyalty and Commitment	10
5. COMPLIANCE AND MONITORING.....	13
5.1. Compliance	13
5.2. Monitoring	13

PRESENTATION OF THE OMATAPALO GROUP CODE OF ETHICS AND BUSINESS CONDUCT

This Code of Ethics and Conduct enshrines the vision, mission and values that define the Ethics of OMATAPALO, and establishes rules that enhance, develop or complement them, thus defining the Conduct of all direct and indirect recipients hereinafter identified.

1. OMATAPALO ETHICS AND CONDUCT

OMATAPALO's Ethics and the Conduct of its Employees characterise and have characterised OMATAPALO Group operations throughout its 16 years of history, and are a source of pride and incentive for the Group's growth.

The central core of OMATAPALO's Ethics is based on its vision, mission and values, which are stated below:

VISION

To be a partner in our Customers' success, as an engine of economic and social development; to be a market benchmark for the quality of our products and services and for acting with a sense of responsibility and social awareness.

MISSION

Consolidate our presence in the domestic market and in international markets, focusing on the company's preferential area of activity.

Pursue effectiveness and efficiency in the company's resource management to continuously improve how we meet our responsibilities and the quality of products and services.

VALUES

Rigour and professionalism

Guarantee excellent service to our customers, on time, ensuring quality standards and meeting deadlines, and permanently developing our teams' capacity in all areas of knowledge related to our activity.

Solidity

We operate in search of continuous improvement, we work towards achieving goals and objectives

so as to make the company a market benchmark for profitability and competitiveness.

Loyalty and commitment

We support professional development and recognise merit and creativity as a stimulus to productivity and progress.

Well-being and community development

We are committed to the development and well-being of the communities in which we operate.

2. SCOPE OF THE CODE OF ETHICS AND BUSINESS CONDUCT

This Code has been approved by OMATAPALO - Engenharia e Construção, S.A., as the head company of the OMATAPALO Group, and its purpose is to ensure that all persons linked to any Group company behave according to rules representing the highest commitment to comply with laws, standards, contracts, procedures and ethical principles.

This Code is mandatory for all persons linked to any OMATAPALO Group company, regardless of the type of contract which determines their employment relationship, the position which they occupy or the geographical location where they perform their work.

The rules of conduct contained in this Code also affect all entities within the OMATAPALO Group's perimeter of consolidation and management scope.

3. COMPLIANCE PRINCIPLES

3.1. We respect the laws in force and comply with standards

We are committed to carrying out our business and professional activities in accordance with the laws in force wherever such activities take place.

3.2. We are exemplary in our conduct

Our performance protects the OMATAPALO Group's reputation and is a model of ethics, rigour, professionalism and honesty.

3.3. We are diligent and accountable for our performance

We apply a uniform model of ethics and compliance based on appropriate supervision to prevent, detect and eradicate irregular conduct.

In the OMATAPALO Group we understand that appropriate supervision concerning ethics and compliance includes an adequate assessment of the ethics and compliance models of third parties with whom we maintain relationships.

3.4. We report irregularities

We make the organisation aware of incidents or irregularities which become known to us through our own channels.

3.5. We respect the Environment

Preservation of and respect for the environment are principles essential to our operation.

3.6. We comply with Internal rules

We are committed to complying with the OMATAPALO Group's internal rules, including those contained in this Code of Ethics and Business Conduct.

4. OPERATIONAL PRINCIPLES OF THE OMATAPALO GROUP

4.1. Honesty and Respect

4.1.1. We respect laws and ethical values

Legal compliance is always our starting point

In the OMATAPALO Group we are committed to developing our activities in accordance with current legislation and the Company's standards and procedures, wherever we operate.

Respect for individual dignity and fundamental rights is a basic element of the OMATAPALO Group's conduct.

All Group Employees must make this commitment, performing our professional activities with full

respect for human rights and public freedoms.

Honesty and respect of the law and the Company's standards must be constantly present in the daily behaviour of all Group Employees and, especially, their leaders.

Behaviour according to the Company's values is a criterion in the selection and assessment of the Group's Employees, and in the application of disciplinary measures when appropriate.

4.1.2. Zero tolerance for bribery and corrupt practices

Zero tolerance

The OMATAPALO Group does not tolerate corruption, bribery or any form of extortion. It is forbidden to influence the will of third parties for the purpose of obtaining an advantage, favourable treatment or a guarantee of obtaining benefits for the company, for oneself or for others, through any type of payment, consideration in kind, directly or through third parties.

Relationships with customers, suppliers, partners, employees or persons or entities that have, have had or may have dealings with the Group must be undertaken by persons authorised to do so, and shall remain within the limits established in this Code.

Offering and accepting gifts and invitations

The delivery of any gift outside customary business practice or courtesy is not permitted, and may in no case be intended in exchange for or in the expectation of favourable treatment in any activity related to the Group.

Gifts, payments, commissions or any other personal benefits may not be solicited from current or potential customers, suppliers or persons who maintain, or expect to maintain relationships with the Group, nor from anyone acting on their behalf. This definition includes the provision of personal services, job offers, travel, preferential treatment, special discounts or anything else of value.

4.1.3. We act against money laundering and the financing of terrorist activities

We remain alert in order to prevent illicit activities

In the OMATAPALO Group we are particularly diligent in complying with standards relating to money laundering and the financing of terrorism.

The Group does not, as a general rule, allow cash payments and receipts. Any exception must be properly documented and authorised, small in amount and comply with the relevant local legislation

in force.

In the jurisdictions and activities where the Group is required to monitor and report, the diligence measures undertaken must be in accordance with relevant legal provisions.

4.1.4. We protect free competition and best market practices

Our goal of becoming a market benchmark is a responsibility and not just an advantage

We observe the rules and principles of free competition in all markets in which we operate. We behave fairly, avoiding any conduct that constitutes or may constitute collusion, abuse or market restriction.

The OMATAPALO Group prohibits conduct that may impede the development and preservation of effective competition.

We avoid any conduct that may lead to abuse or price manipulation.

4.1.5. We avoid conflicts of interest

Duty of loyalty

During the performance of our professional responsibilities, we shall act with loyalty and defend the interests of the OMATAPALO Group, avoiding situations that may give rise to a conflict between our personal interests and those of the Group. In the exercise of their position or responsibility, Employees are not allowed to act in ways that lead to a current or future benefit in their favour or in favour of related third parties.

Additionally, managers must know and apply commercial law and the Board of Directors' Rules regarding conflicts of interest and the duty of loyalty regarding transactions involving related parties.

4.2. Rigour and Professionalism

4.2.1. Rigour in supervision, accuracy and transparency

The OMATAPALO Group's information must be prepared with the greatest accuracy, in compliance with applicable standards and the Company's standards, as well as be diligently monitored and stored.

We are responsible for undertaking our work in accordance with the Company's standards and procedures so that we can account for our actions at all times.

Transparency is one of the Group's basic principles. In this respect, all employees must cooperate with internal and external supervision departments, supervisors, regulators and legal and administrative authorities, responding to their requests and requirements and providing the requested information rapidly and accurately within the scope of their authority.

4.2.2. We protect the Group's reputation and image.

We are all responsible for looking after the OMATAPALO Group's image and reputation

The relationships the Group or its employees have with the media are reserved for the manager responsible for Marketing and Communication.

Any call, request for information, questionnaire or equivalent must be sent by the employee who receives it to the aforementioned manager.

An employee who needs to contact a media outlet must therefore inform the aforementioned manager.

4.2.3. We use the company's resources and assets efficiently and securely.

The Company's assets must be protected and used responsibly and efficiently

The OMATAPALO Group provides its employees with the means and resources they need to perform their professional duties. Their use must be efficient and in accordance with internal regulations, employing appropriate methods to prevent loss, theft, damage or waste.

The OMATAPALO Group has a Code of Use for Technological Resources. All employees must consult this Code to ensure we make appropriate, lawful and responsible use of such resources, including IT tools and email.

We are all accountable, and we are responsible for acting with due diligence, cooperating with management and auditing authorities in their monitoring and supervisory tasks related to the use of such resources, at any time they deem appropriate.

4.2.4. We monitor ownership and confidentiality of data and information.

The duty to protect information and data in order to prevent unauthorised access is everyone's obligation

As employees of the OMATAPALO Group, we manage information that is often confidential, whether economic, financial, technical, personal, commercial or administrative (on paper or in digital form), of great value to the Group, and subject to the intellectual property and personal data processing laws in the jurisdictions where we operate.

All persons working for the OMATAPALO Group are obliged to comply with existing Company standards pertaining to Information Security and Data Protection, as well as to respect the measures that the Group has implemented to prevent outside persons and employees from gaining unauthorised access to information and/or data.

It should be emphasised that the obligation of confidentiality and discretion persists even after the relationship with the OMATAPALO Group has ended.

4.3. Loyalty and Commitment

4.3.1. Our customers are the centre of our attention

Our activity centres on our customers, so we strive to establish long-lasting relationships founded on mutual trust, honesty, professional responsibility and added value

We direct our efforts towards getting to know the customer, offering products and services according to their needs, seeking excellence and prioritising customer satisfaction in our service.

We conceive, design and sell products and services of the highest quality, adding differentiated value for our customers compared to other propositions on the market.

We are committed to innovation.

We behave fairly in our relationships with customers

We communicate the characteristics of our products and services transparently, providing accurate, true, complete and understandable information.

We respect the commitments we have made and act with integrity.

4.3.2. Health and safety is paramount

It is everyone's responsibility to make our ambition of having zero accidents a reality

The prevention of occupational hazards constitutes a differentiating element for the OMATAPALO

Group, and is an indispensable requirement for protecting the health and safety of employees. The OMATAPALO Group has a strategy and action plans for preventing occupational hazards in each of its businesses, aligned with the legislation in force in each country.

All employees are obliged to observe and monitor compliance with safety standards and the use of protective material intended for this purpose.

4.3.3. We promote diversity and fair treatment

Create a fair, diverse work environment that promotes professional and personal development

Fair treatment is a principle of action. The Group develops programmes, internal procedures and actions aimed at creating an enriching work environment that favours diversity, free from discrimination of any kind.

Selection and promotion decisions within the OMATAPALO Group are always based on merit and objective and transparent assessments.

4.3.4. We are committed to the environment that surrounds us

Working toward sustainable development is part of our mission as we strive for efficiency in our use of resources and to minimise impacts

The OMATAPALO Group conducts its activity in accordance with the following premises:

- Efficiency in resource consumption;
- Prevention of negative environmental impacts, protection of ecosystems and historical, cultural and archaeological heritage;
- Reduction of greenhouse gas emissions.

We strictly comply with laws concerning the environment and act with emphasis on prevention

4.3.5. We deal transparently with the community

Community investments should be transparent and adequately documented

The OMATAPALO Group invests in the development of society and its citizens, transparently promoting and financing initiatives and projects that meet important social needs via our Corporate Social Responsibility Policy.

The sponsorships, contributions or donations made by the Group will be granted with respect to objective criteria related to the Group's activities, to entities of recognised prestige and ethical behaviour which have an appropriate organisational structure for ensuring good resource management.

All contributions or sponsorships, including those that take place in kind, must be documented and duly authorised, and, to the extent possible, they must be followed up with the aim of knowing their final destination or use.

4.3.6. We extend these commitments to our business partners

In our relationships with suppliers, subcontractors, partners and employees, we seek to establish balanced and transparent cooperation frameworks that promote stable, long-lasting business relationships and maximise benefits for both parties

In the OMATAPALO Group we share our commitment to ethics and legal compliance, promoting advanced occupational health and safety practices, encouraging cooperation with those responsible for certifying social, environmental and advanced ethical standards, whether through their subscription to this Code, by including specific clauses in contracts, or through certification of compliance models compatible with those of the Group.

Employees should take the initiative and use both their skills and the human and technical resources that the Company provides in order to promote efficiency, innovation, increased productivity and improved team organisation and operation, since the performance of each individual will define the Company's overall performance.

Without prejudice to the sense of belonging and unity that should be encouraged by everyone within the Company and within the Group, Employees should have a clear idea that they are using and operating equipment, assets and investments that are not their own property, and that they directly and indirectly affect a vast range of other people, including shareholders, other Employees and even the various entities with which the Company and Group interact.

Employees should therefore produce minimum waste and take care when using equipment and assets, whether they belong to the Company or to third parties, acting with a heightened sense of responsibility.

5. COMPLIANCE AND MONITORING

5.1. Compliance

This Code of Ethics and Business Conduct is applicable to all Company Employees, who should know it, comply with it, and promote compliance with it – within the scope of their actions – as well as raise awareness of its existence and content.

Failure to comply with the Code of Ethics and Business Conduct may entail the commencement of disciplinary proceedings against non-compliant Workers, as well as the filing of potential claims, including legal action, and potential complaints to the competent authorities regarding all non-compliant Employees.

5.2. Monitoring

The Code of Ethics and Business Conduct is available at the Company's head office, on the OMATAPALO - Engenharia e Construção, S.A. website, as well as at permanent and temporary facilities, where those in charge must have immediate access to a copy of this Code, namely by possessing a physical copy or having access to it through the OMATAPALO Group Portal, and may use it or make it available whenever such is deemed necessary, that is, when requested by any other Employee or by any third parties.

Employees are responsible for ensuring compliance with this Code of Ethics and Business Conduct, raising awareness of it, invoking it in their defence, applying it and calling for its application by all ranks, including their own, as well as reporting any irregularities identified using the appropriate methods and procedures developed by each Company for this purpose, and tend to be defined as an Ethics Channel.

Without prejudice to such methods, it this Code also assumes that any such irregularities identified in relation to any internal or external regulations should be reported via the following methods:

- Correspondence addressed to the OMATAPALO - Engenharia e Construção, S.A. Board of Directors or Audit Committee;
- Email the independent body constituted within the framework of the OMATAPALO Group at compliance@omatapalo.com.

The Company guarantees the confidentiality of communications received, the absence of any reprisals to complainants for complaints made in good faith, and the protection of the personal data of the

complainant and whoever is suspected of committing the infraction. Reprisals against complainants are condemned by the Company and may give rise to disciplinary proceedings against the perpetrators of such reprisals and the persons who enable them.