



## CODE OF ETHICS AND CONDUCT



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# TABLE OF CONTENTS

1	INTRODUCTION
2	COMPLIANCE WITH LAWS AND APPLICATION OF THIS CODE
3	ETHICAL AND CONDUCT STANDARDS
3.1	HUMAN RIGHTS AND THE WORKPLACE ENVIRONMENT
3.2	ENVIRONMENT
3.3	SOCIAL RESPONSIBILITY
3.4	FOCUS ON CLIENTS
3.5	COMMUNICATION WITH THE MARKET AND PRESS
3.6	SOCIAL MEDIA
4	ACCOUNTING AND FINANCIAL RECORDS OF ANDRADE GUTIERREZ
5	CONFLICT OF INTERESTS
6	CONFIDENTIALITY OF PRIVILEGED INFORMATION
7	RELATIONSHIP WITH PUBLIC AUTHORITIES
8	OBSERVANCE OF ANTITRUST LAWS
9	COMPOSITION OF THE ETHICS COMMITTEE
10	NON-COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT
11	COMMUNICATION CHANNELS
	TERM OF COMMITMENT

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## INTRODUCTION

COMPLIANCE WITH THE PRINCIPLES THAT GUIDE THE CULTURE OF ANDRADE GUTIERREZ S.A. AND OF THE COMPANIES UNDER ITS DIRECT OR INDIRECT CONTROL ("ANDRADE GUTIERREZ") ASSUMES THAT OUR EMPLOYEES WILL BASE THEIR ACTIONS ON THE OBSERVANCE OF THE PROVISIONS IN THIS CODE OF ETHICS AND CONDUCT ("CODE"), WHILE PRESERVING OUR CORPORATE IDENTITY, WHICH IS THE BASIS TO SURPASS THE EXPECTED RESULTS.

Andrade Gutierrez believes that the preservation and fostering of ethical principles in the markets where it operates are essential to provide greater solidity to the basis of its growth and ensure its perpetuity. Andrade Gutierrez's reputation is one of its most valuable assets, built by applying our principles and values, all of which are present in Andrade Gutierrez's culture.

Thus, the provisions included in this Code must be practiced by all employees and companies that form Andrade Gutierrez and must be transmitted to our partners, whether they are clients, suppliers, joint participants in consortiums or other third parties ("PARTNERS"), so as to ensure the full application of the policies contained herein and the creation of a fairer and more efficient business environment in the markets where we operate.

2

## COMPLIANCE WITH LAWS AND APPLICATION OF THIS CODE

ANDRADE GUTIERREZ UNDERTAKES TO KEEP THE HIGHEST STANDARD OF ETHICAL BEHAVIOR, IN STRICT COMPLIANCE WITH THE NORMS IN FORCE IN EACH OF THE MARKETS WHERE IT OPERATES. THE ACHIEVEMENT OF SUCH GOALS DEPENDS ON THE UNDERSTANDING, BY OUR EMPLOYEES AND PARTNERS, OF THE CULTURE, HISTORY, LEGAL AND INSTITUTIONAL ENVIRONMENT INHERENT TO EACH JURISDICTION.

It is essential for every person who is part of Andrade Gutierrez, whether administrators or employees, to know this Code, undertake the commitment to comply with it and observe the practices contained herein, thus preventing the occurrence of legal or ethical violations or behaviors that may compromise our integrity and reputation.

**Therefore, this Code applies to: all employees of Andrade Gutierrez, including advisers, directors, employees, trainees and apprentices ("EMPLOYEES").**

In the companies where Andrade Gutierrez shares control with third parties, it shall always be advisable, the application of this Code. However, such companies may adopt other codes and policies, provided that they are in line with the rules and principles described herein.

Andrade Gutierrez shall only forge relationships with Partners that:

- (i) adopt practices of ethical integrity and conduct;
- (ii) comply with the legislation applicable to the development of their activities and fulfillment of their contractual commitments;
- (iii) keep proper confidentiality regarding the privileged information that may come to possess as a result of the activities developed for or together with Andrade Gutierrez.

It shall be the responsibility of the Ethics Committee to submit to the Board of Directors of Andrade Gutierrez S.A. amendments and adjustments to this Code, with the aim of ensuring the continuous improvement and adoption of the most modern practices of ethical conduct.



### THE EMPLOYEE MUST:

- Know AG's Code of Ethics and Conduct and commit to comply with it.
- Comply with the norms and other regulations applicable to its activities.
- Transmit the guidelines to our partners, whether customers, suppliers, consortia partners or other third parties.
- Know and comply with all applicable Policies, Norms and Procedures for your position and duties.

3

## ETHICAL AND CONDUCT STANDARDS

CONDUCT AND RELATIONSHIP BETWEEN EMPLOYEES, AS WELL AS  
THE RELATIONSHIP WITH COMPETITORS, PARTNERS AND PUBLIC  
AGENTS SHALL BE GOVERNED BY THE PRINCIPLES  
DESCRIBED HEREIN.

The internal and external public are composed of people with whom Andrade Gutierrez maintains a professional actual or potential relationship, always grounded on the application of the principles and rules of conduct set out in this Code.

3.1

## HUMAN RIGHTS AND THE WORKPLACE ENVIRONMENT

THE RELATIONSHIP OF ANDRADE GUTIERREZ WITH ITS  
EMPLOYEES AND THE RELATIONSHIP BETWEEN EMPLOYEES  
MUST BE BASED ON THE PRINCIPLES OF MUTUAL TRUST,  
RESPECT AS WELL AS ON THE AWARENESS OF THE NEED TO  
TREAT OTHERS WITH DIGNITY.

Andrade Gutierrez does not tolerate any form of violation of human rights, whether it is prejudice, discrimination or harassment, both in the relationship between employees and between employees and third parties, whether because of race, color, religion, political affiliation, nationality, gender, sexual orientation, age, physical condition or any other feature. Andrade Gutierrez does not allow campaigns or actions to seek the adhesion from employees, connected to matters of a political or religious nature in the workplace.

Hostilities, embarrassment, threats or intrusions into people's private lives, as well as inappropriate insinuations of any kind, whether these are of discriminatory nature or classified as moral or sexual harassment, regardless of the hierarchical level of those involved, shall not be admitted, under any circumstance.

The same principles described above shall be complied with upon the engagement, promotion or setting of the remuneration of employees or service providers. Andrade Gutierrez defends a fair human resources policy, based on meritocratic performance, making the expectations that guide the assessment and promotion processes clear.



In Andrade Gutierrez, the workplace must comply with the standards and better practical of social responsibility and health and safety of the work, pursuant to the applicable legislation.



### THE EMPLOYEE MUST:

- Respect everybody.
- Be honest in their relationships.
- Cultivate friendly relationships.



### THE EMPLOYEE MUST NOT:

- Promote campaigns or actions of political or religious nature in the work atmosphere.
- Participate on offensive or improper jokes or use curse words.
- Embarrass, threaten or barge in the work friends' private life.



3.2

## ENVIRONMENT



RESPECT FOR THE ENVIRONMENT IS A CENTRAL PRINCIPLE IN THE FULFILMENT OF ANDRADE GUTIERREZ'S ACTIVITIES. ANDRADE GUTIERREZ PROMOTES IN THEIR UNITS THE ADOPTION OF INTEGRATED MANAGEMENT SYSTEMS, WITH CERTIFICATION IN QUALITY, ENVIRONMENT AND OCCUPATIONAL HEALTH AND SAFETY, IN ACCORDANCE WITH THE STANDARDS AND RULES APPLIED INTERNATIONALLY.

All employees must work responsibly, **identifying and preventing environmental risks in the course of their activities**, promptly informing the applicable instances within their respective organizations and the public authorities of any accident that may cause damages to the environment.

Andrade Gutierrez ensures the responsible use of natural resources and encourages its employees and partners to seek sustainable solutions for their activities that have the smallest possible impact on the environment.



### THE EMPLOYEE MUST:

- Respect the legal demands.
- Communicate any incident or environmental accident to the manager of Environment of his/her Unit.



3.3

## SOCIAL RESPONSIBILITY

ANDRADE GUTIERREZ UNDERTAKES TO SUPPORT SOCIAL RESPONSIBILITY ACTIONS AND PROMOTE SUSTAINABLE DEVELOPMENT, REGARDING HUMAN RIGHTS, NOT TOLERATING THE USE OF CHILD OR FORCED LABOR AT ANY LEVEL OF ITS ORGANIZATION OR SUPPLY CHAIN.

Projects of renowned reputation and respectability, whether of educational, sports, cultural or philanthropic nature, as well as sponsoring of activities whose values are compatible with the principles contained herein, are a part of Andrade Gutierrez's **social responsibility commitment**.



### THE EMPLOYEE MUST:

- Support the actions of social responsibility.
- Respect the human rights.



### THE EMPLOYEE MUST NOT:

- Disrespect anyone, that includes coworkers and communities that he/she is a part of.
- Use of child or forced labor in the work places.
- Allow child exploitation in the work places.



3.4

## FOCUS ON CLIENTS

THE COMMITMENT OF DELIVERING GOOD RESULTS TO THE CLIENT IS A FUNDAMENTAL PART OF OUR CULTURE. THIS, IN DEALING WITH THE CLIENTS, THE EMPLOYEES MUST HAVE AN ETHICAL AND EFFICIENT CONDUCT, CONVEYING CLEAR AND USEFUL INFORMATION, WITHIN THE PROMISED OR EXPECTED DEADLINE, CLEARLY HIGHLIGHTING THE RISK FACTORS INHERENT TO THE PROJECT AND OUTLINING A PROPER ACTION STRATEGY, ALWAYS ALIGNED ON THE PRINCIPLES AND STANDARDS OF CONDUCT PROVIDED IN THIS CODE.



### THE EMPLOYEE MUST:

- Look for solutions aligned with the customer's needs.
- Relate in an ethical and transparent way with the customer.



### THE EMPLOYEE MUST NOT:

- Act in bad faith.
- Lie in the negotiations and in the relationship with the Customer.

3.5

## COMMUNICATION WITH THE MARKET AND PRESS

A GOOD RELATIONSHIP AND COMMUNICATION WITH THE MARKET AND THE PRESS ARE IMPORTANT FOR CONDUCTING OUR BUSINESS. THEREFORE, LECTURES, CONFERENCES, PRESENTATIONS, INTERVIEWS, PUBLICATIONS, COMMENTS AND ANY OTHER FORM OF COMMUNICATION WITH THE OUTSIDE PUBLIC, WHERE STRATEGIC OR BUSINESS PLANS, RESULTS, CONCEPTS, NAME AND IMAGE OF ANDRADE GUTIERREZ ARE EXPOSED CAN ONLY BE CARRIED OUT WITH THE CONSENT AND GUIDANCE FROM THE **EXTERNAL COMMUNICATION AND COMPLIANCE AREAS**.

In order to ensure the accuracy of the information Andrade Gutierrez provides to the public, no statement shall be made, whether written or verbal, online or in printed media, on behalf of Andrade Gutierrez without the prior authorization from the **External Communication**.



3.6

## SOCIAL MEDIA

ANDRADE GUTIERREZ ACKNOWLEDGES THE  
ROLE THE SOCIAL MEDIA CURRENTLY PLAY IN  
COMMUNICATION AND SOCIETY.



### THE EMPLOYEE MUST:

- Request authorization to the External Communication and Compliance areas when invited to participate in lectures, presentations, interviews or any other communication form with the external public.

Andrade Gutierrez acknowledges the role the social media currently play in communication and society. Employees must protect confidential information and use their common sense when taking part in social media. Thus, Andrade Gutierrez and its Collaborators undertake to:

- (i) safeguard the company's image;
- (ii) observe and comply with the social media use guidelines;
- (iii) observe the rules applicable to communication with the market and the press;
- (iv) address any requests for information submitted by any information vehicle to the area of External Communication.



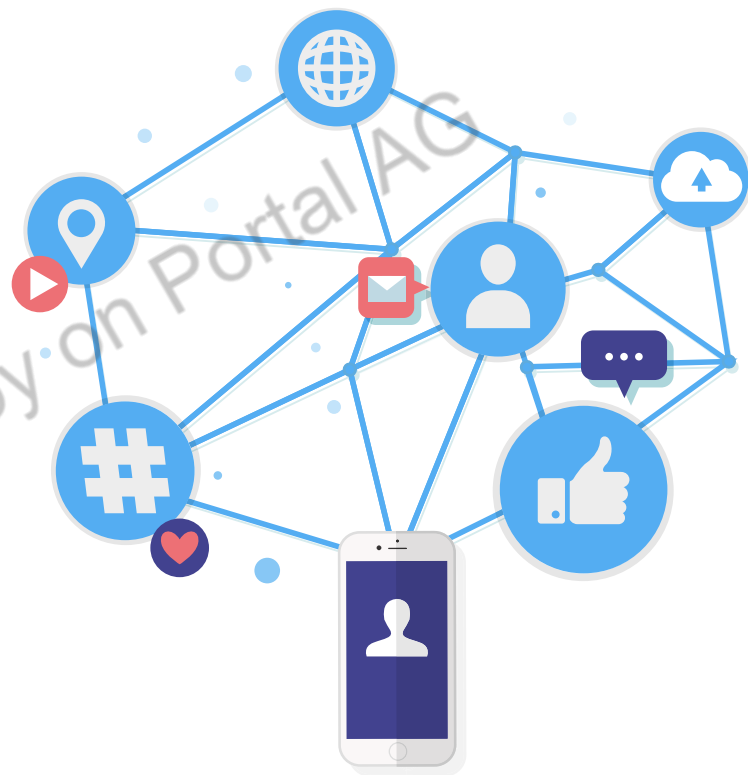
### THE EMPLOYEE CAN:

- Identify as employee of AG in personal profiles.
- Use his/her personal social network publishing pictures, videos or comments on his/her day by day in the work in a positive way.
- Publish or to share content of the official channels of AG in his/her personal social net.



### THE EMPLOYEE CAN'T:

- Publish in his/her social network confidential information, including financial, juridical, quotations, proposals, among other sensitive subjects.
- Comment on in his/her social network about customers, partners, suppliers or work friends.
- Without Compliance and External Communication previous authorization, speak on behalf of AG in any communication vehicle, including any social network.
- Post pictures or videos of work friends, partners, customers or suppliers without permission.

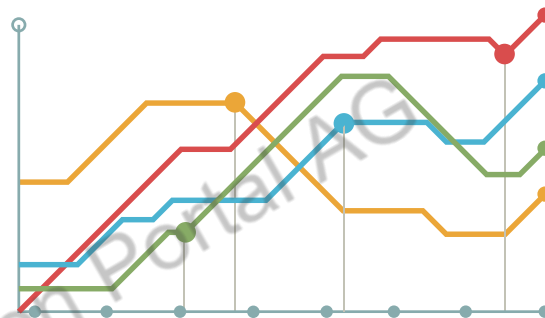


4

## ACCOUNTING AND FINANCIAL RECORDS OF ANDRADE GUTIERREZ

ANDRADE GUTIERREZ SHALL MAINTAIN, AT ALL TIMES, A TRANSPARENT, AUTOMATED, UP-TO-DATE AND ACCURATE ACCOUNTING AND FINANCIAL RECORDS AND BOOK SYSTEM, STRICTLY COMPLYING WITH THE APPLICABLE LEGISLATION AND REGULATORY STANDARDS.

No operation of an economic-financial or equity nature, involving any company that is part of Andrade Gutierrez, shall be made outside the commercial or tax books. All employees must properly inform the departments in charge of any transactions and payments, for them to be duly ascertained, justified and entered in the accounting records, from the start.



All support documentation for the transactions must be kept for, at least, five (5) years, unless a longer period is required by specific legislation.



### THE EMPLOYEE MUST:

- Guarantee accounting and financial reports and records reflect the reality.
- Elaborate accounting and financial reports and records in agreement with the applicable legislation.

5

## CONFLICT OF INTERESTS

THERE IS A CONFLICT OF INTERESTS WHEN AN EMPLOYEE USES HIS OR HER POSITION, JOB OR BUSINESS ROLE TO OBTAIN AN UNDUE, DIRECT OR INDIRECT ADVANTAGE, IN CONFLICT WITH THE INTERESTS OF ANDRADE GUTIERREZ.

For Andrade Gutierrez, the mere appearance of a conflict of interests can cause just as much damages to its reputation and business as a concrete situation. Therefore, it is advisable to avoid situations that may appear to be a conflict of interests, even if such conflict is not ascertained in the concrete case.



### THE EMPLOYEE MUST:

- Inform the Compliance area any family or social relationship with Public Agents, People Exposed Politically, PEP, suppliers, partners and/or customers.



### THE EMPLOYEE MUST NOT:

- Practice parallel or conflicting professional occupation with his/her position in AG.

Employees are forbidden to receive any kind of payment or advantage, including cash, gifts, meals, accommodation or entertainment, that disagree with its internal guidelines.

### AS AN EXAMPLE, CONFLICT OF INTERESTS IS ASSUMED IN THE FOLLOWING SITUATIONS:

- Hiring of a supplier that is a friend or family member, under conditions less favorable to Andrade Gutierrez when compared to those established in the market by third parties with equivalent capacity;
- Abuse, by any employee, of his or her position in companies that are part of Andrade Gutierrez, in order to obtain personal advantages or advantages to third parties.
- The development, by an employee, of executive nature professional activities, in parallel with his/her position in Andrade Gutierrez;

The Associates must safeguard Andrade Gutierrez's material and intellectual assets, using the corporate equipment and means of communication only for their professional and in accordance with the internal regulations, avoidance of waste and deviation of resources, equipment or services for personal purposes or purposes that are not compatible with Andrade Gutierrez's interests.

When they are about to close transactions with third parties where their family members work as partners with relevant participation or as executives, the employees must obtain prior written authorization from the Compliance area.



6

## CONFIDENTIALITY OF PRIVILEGED INFORMATION

THERE IS A LOT OF CONFIDENTIAL INFORMATION AND, CONSEQUENTLY, CANNOT BE DISCLOSED WHETHER DUE TO APPLICABLE LEGISLATION OR COMMITMENTS UNDERTAKEN WITH THIRD PARTIES.

The whole circulating information and data, whether produced or kept in the systems or in equipment owned by Andrade Gutierrez, are its exclusive property, regardless of the employee responsible for designing them. The rights over the know-how and industrial property as well as the confidentiality duty must be observed, even after the employees have left Andrade Gutierrez.

All Associates who have access to privileged information are obliged to keep the confidentiality of such data and are automatically forbidden from negotiating with any securities issued by companies belonging to Andrade Gutierrez or by any other companies involved in the transaction that gave rise to such information, prior to its being officially disclosed.

All employees with access to privileged information must keep the confidentiality of such data and are automatically forbidden from negotiating with any securities issued by companies owned by Andrade Gutierrez or by any other companies involved in the transaction that gave rise to such information, prior to its being officially disclosed.

Any information that may reasonably influence the following is considered to be privileged:

- (i) the quotation of securities of a publicly-held company;
- (ii) the investors' decision to buy, sell or keep such securities;
- (iii) the investors' decision to exercise any rights inherent to their condition of holders of securities issued by the company or connected thereto;
- (iv) information subject to secrecy by force of contractual obligation; or
- (v) any information of a strategic nature, including that which may affect Andrade Gutierrez's competitiveness in competitive procedures.



Only employees that have been formally authorized can make public statements providing information, always accounting for confidentiality, when applicable. The information that is publicly disclosed must be transparent, clear and complete, considering the moment when it is given, with the best interests of the companies or persons involved in mind.



### THE EMPLOYEE MUST:

- Publish, when authorized, just transparent and true information.
- Maintain secrecy of the confidential information, complying with the applicable legislation and commitments.



### THE EMPLOYEE MUST NOT:

- Share confidential information of AG or of company's partners.
- Speak of confidential subjects in public places.
- Use information and contents of AG for private subjects or of third parties without the due authorization.

7

## RELATIONSHIP WITH PUBLIC AUTHORITIES

ALL EMPLOYEES ARE EXPRESSLY FORBIDDEN FROM OFFERING, PROMISING, AUTHORIZING OR GIVING, WHETHER DIRECTLY OR BY MEANS OF THIRD PARTIES, ANY UNDUE ADVANTAGE OF ANY NATURE, WHETHER IT IS CASH OR ANY VALUABLE GOOD OR SERVICE, TO PUBLIC AGENTS, POLITICAL PARTIES AND THEIR MEMBERS OR ANY CANDIDATES FOR PUBLIC OFFICE, IN BRAZIL OR ABROAD, AS WELL AS REPRESENTATIVES AND FAMILY MEMBERS AND SIMILAR PEOPLE, WITH THE AIM OF OBTAINING PERSONAL BENEFIT OR BENEFIT ON BEHALF OF ANDRADE GUTIERREZ.

As for offering of gifts to public agents, only those without commercial value or that are distributed as a courtesy are allowed, for advertising purposes and as a regular disclosure, upon special events or commemorative dates, offered in a general manner and, therefore, not purposefully intended for specific bodies or authorities, always complying with the regulations and guidelines applicable to the respective counterpart.

**Political donations by any company part of Andrade Gutierrez are prohibited. The associates can make donations using their own funds, provided that the applicable legislation is complied with and there is no involvement and link from Andrade Gutierrez.**

The employees have total freedom to exercise their political rights, but must:

- (i) preserve Andrade Gutierrez from any connection to political parties;
- (ii) resign from their positions at Andrade Gutierrez prior to launching themselves as candidates.

Candidates for political office, persons occupying diplomatic positions and in international organizations, employees of companies directly or indirectly controlled by public entities, private concessionaires or grantees of public services are considered as equivalent to public agents, both in Brazil and abroad.



### THE EMPLOYEE MUST:

- Inform the Compliance area cases regarding concession of gifts, presents, entertainment or hospitalities to Public Agents, according to internal guidelines.
- Protect AG of any link to private political-supporting positions.
- Resign from AG prior to his/her candidacy to political positions.
- Consult the Ethics Committee regarding any doubt concerning the relationship with Public Agents.



### THE EMPLOYEE MUST NOT:

- Offer, promise, authorize or give any improper advantage to Public Agents or people to them related.
- Offer gifts that exceed R\$ 100, 00 (one hundred real) or the equivalent in local currency.
- Offer entertainment and hospitality for Public Agents for tourist ends.
- Contribute with any resources for the practice of actions that can be considered harmful to the direct or indirect public administration, national or foreign.
- Use interposed person to hide harmful actions to the direct or indirect public administration, national or foreign.
- Fraud, manipulate or interfere illegally in sales and public auctions.
- Interfere or hinder inspections or investigations.



8

## OBSERVANCE OF ANTITRUST LAWS

THE COMPANIES THAT ARE PART OF ANDRADE GUTIERREZ AND THEIR RESPECTIVE COLLABORATORS MUST ALWAYS ACT INDEPENDENTLY FROM THEIR COMPETITORS, WHETHER IN THE PRIVATE SECTOR OR IN NEGOTIATIONS INVOLVING PUBLIC ADMINISTRATION, DIRECTLY OR INDIRECTLY.

Andrade Gutierrez and employees must acknowledge the applicable competition laws. Any acts whose purpose is to limit, distort or in any way prejudice free competition, arbitrarily increase profits or abuse a dominant position shall be prohibited.

In their relationship with competitors, employees must heed the antitrust rules and are forbidden to engage in any agreements and/or exchange of commercially sensitive confidential information (such as price, costs, margins, commercial or investment plans) with competitors as well as in any understandings and/or agreements between competitors, whether explicit or tacit, which may entail or influence, whether directly or indirectly, the setting of prices,

adjustments, discounts, production shares and/or sales conditions, market or client division, among other measures that may limit or restrict in any way free competition in the market.

Any acts that may be classified as unfair competition are likewise forbidden.

The constitution of associative contracts, consortia or partnerships in a way in general with contestants they are allowed, should be observed the dispositions contained in the legislation effective competitive.



### THE EMPLOYEE MUST:

- Negotiate in good faith observing the current legislation and internal guidelines.
- Refuse to receive confidential information about competitors.



### THE EMPLOYEE MUST NOT:

- Agree, manipulate or adjust with competitor, in any form, price, division of parts or segments of a market.
- Prejudice or defraud, through adjustment, combination or any other means, the competitive nature of the public or private competitive procedure.
- Prevent, disrupt or defraud the performance of any competitive act.



## 9 COMPOSITION OF THE ETHICS COMMITTEE

THE ETHICS COMMITTEES OF ANDRADE GUTIERREZ ARE COMPOSED OF, AT LEAST, 3 (THREE) AND, AT MOST, 9 (NINE) MEMBERS, ELECTED BY THE BOARD OF DIRECTORS OR BY THE GENERAL ASSEMBLY (IN CASE THE COMPANY DOES NOT HAVE A BOARD OF DIRECTORS), CHOSEN FROM PROFESSIONALS WITH FLAWLESS REPUTATION. IT IS FORBIDDEN TO ELECT A FULL MEMBER OF THE BOARD OF DIRECTORS OF ANDRADE GUTIERREZ S.A. TO INTEGRATE THE ETHICS COMMITTEES OF CONTROLLED COMPANIES. ETHICS COMMITTEES SHOULD CHOOSE ITS COORDINATORS AMONG ITS MEMBERS. ITS ETHICS COMMITTEES SHOULD REPORT TO THE BOARD OF DIRECTORS OF ANDRADE GUTIERREZ S.A.

The Ethics Committee shall be responsible for:

- (i) following-up on and improving the corporate conduct guidelines;
- (ii) training, raising awareness, disseminating and applying the ethical conduct standards among the members of Andrade Gutierrez;
- (iii) clarify any doubts the employees may have on the internal guidelines of the Program of Compliance and other AG guidelines related to the Code;
- (iv) supervising the work of other departments or determining any violation to the Code;
- (v) implementing and maintaining communication channels, ensuring anonymity is preserved;
- (vi) conducting inquiries that may be carried out in any of Andrade Gutierrez's companies, in order to investigate possible unlawful acts performed as violation to the provisions in this Code;
- (vii) recommending to the Board of Directors or the General Shareholders' Meeting (in case the company does not have a Board of Directors) the application of appropriate penalties; and

(viii) reporting directly and periodically to the Board of Directors or the General Shareholders' Meeting (in case the company does not have a Board of Directors) the subjects related to the achievement and development of the activities under its jurisdiction.

In order to establish an effective and comprehensive scope, the Board of Directors of Andrade Gutierrez S.A. may recommend the creation of other ethics committees within any company controlled by Andrade Gutierrez (the "CONTROLLED COMPANIES' ETHICS COMMITTEES"). The provisions included in this Code shall fully apply to any and all Controlled Companies' Ethics Committees.

The properly convened Controlled Companies' Ethics Committee shall have the autonomy to apply all guidelines set out in this Code, and its members shall inform the Ethics Committee of Andrade Gutierrez S.A. of all violations to the principles contained herein, as well as the punitive, mitigation or remedial measures that may have been adopted.

10

## NON-COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT

ANY VIOLATION OCCURRED AFTER THE DATE OF APPROVAL OF THIS CODE AND CREATION OF THE ETHICS COMMITTEE SHOULD BE PROMPTLY COMMUNICATED TO THE ETHICS COMMITTEE USING ANY OF THE COMMUNICATION CHANNELS IMPLEMENTED; THE SAID ETHICS COMMITTEE SHALL TAKE SUITABLE MEASURES, NAMELY REGARDING THE RELEVANT PUBLIC AUTHORITIES, AS APPROPRIATE.

The employee, especially in an executive position or member of the board of directors, officer, superintendent or manager, who allows any person bound by this Code to violate any of its principles or rules may be held liable for the violation.

No retaliation shall be allowed against those who, in good faith, communicate any act that entails or may entail a violation to the Code.



**In cases of violation to the Code, will be recommended, by the Ethics Committee, the application of penalties or disciplinary measures, according to applicable legislation and internal guidelines, such as:**

- **Written or verbal warning**
- **Temporary suspension of employment contract**
- **Termination of employment contract**

11

## COMMUNICATION CHANNELS

WHENEVER POSSIBLE, EMPLOYEES SHOULD DISCUSS WITH THEIR MANAGERS THEIR DOUBTS AND REPORTS OF POSSIBLE VIOLATIONS TO THE PRINCIPLES SET OUT IN THIS CODE. INTERNAL DISCUSSIONS CONTRIBUTE TO THE CONTINUOUS IMPROVEMENT OF THE COMPLIANCE PROGRAM OF ANDRADE GUTIERREZ.

Any doubts regarding the interpretation or omission of subjects dealt with in this Code shall be settled by the Ethics Committee where such doubt or omission has arisen.

Employees may use the communication channels, which shall ensure total anonymity, to settle doubts or inform any violations to this Code to the Ethics Committee.



### THE EMPLOYEE MUST:

- Report whenever suspects or witnesses any violation to the Code of Ethics and Conduct.



### THE EMPLOYEE MUST NOT:

- Report false or incorrect events in the communication channels.



### TELEPHONE

**Brazil:** 0800 721 0766

**Portugal:** 800 180 255

**Argentina:** 0800 666 1660

**Peru:** 0800 55590

**Dominican Republic:** 1-888-751-8870

**Collect calls:** 55 11 27394520



### WEBSITE

[andradegutierrez.com/faleconosco](http://andradegutierrez.com/faleconosco)

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# TERM OF COMMITMENT

A N D R A D E   G U T I E R R E Z   G R O U P

I hereby declare that: (a) I have received, read and understood the **Code of Ethics and Conduct of Andrade Gutierrez**; (b) I fully agree with the rules and guidelines set forth therein; and (c) undertake to fully comply with them.

**Name:**

Adviser (   )   Employee (   )   Partner (   )

Individual Taxpayers' Register: \_\_\_\_\_  
(CPF)

National Register of Legal Entities: \_\_\_\_\_  
(CNPJ)

Date:   /   /                      Signature: \_\_\_\_\_



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**ANDRADE  
GUTIERREZ**