

COMPLIANCE POLICY

ZAGOPE - CONSTRUÇÕES E ENGENHARIA, S. A. (ZAGOPE), has as scope market studies, prospection, commercial development, preparation of technical proposals and execution of civil construction works and public works.

ZAGOPE is held 100% held by Zagope SGPS S.A. and is part of the Group Andrade Gutierrez S.A. (AG S.A.).

The Corporate Governance Structure is composed of the Board of Directors of AG S. A., ZAGOPE Administration, Management of Corporate Areas and Operation.

It should be noted that the Compliance and Internal Audit functions report directly to the Ethics and Audit Committees, respectively, ensuring their autonomy and independence.



In all the markets in which it operates, ZAGOPE considers it essential for the development of its business:

- Strict observance of ethical principles, including a ban on bribery;
- Bribery risk management;
- Compliance with legal requirements, including anti-bribery laws, and with the requirements of the statutory Anti-Bribery Management benchmarks;
- Continuous improvement of the management and performance of processes and products;
- Ensuring appropriate treatment of legal, ethical or conduct violations;
- Cultivation of a positive reputation in the market and in society in terms of Compliance and Integrity;
- Culture of Compliance and Integrity on a daily basis and at all levels.

ZAGOPE has ethics as the fundamental basis of its action and relationship with stakeholders, therefore, its Code of Ethics and Conduct is applicable to all collaborators and partners.

As pillars, the commitment of Top Leadership and Compliance actions, including the strengthening of culture through training and awareness-raising, are highlighted.

All collaborators, business partners or any other interested party may report any violation to the Code of Ethics and Conduct and to the Compliance guidelines. For confirmed cases of non-compliance with any of these items, penalties and disciplinary measures shall be applied.

The communication channel “*Fale Conosco*” is the vehicle for reporting 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, in total confidence and without fear of reprisals.

This channel can be accessed by anyone (collaborators or the external public) through the Andrade Gutierrez website or by telephone.

Operated by an external company, the channel “Talk to Us” ensures the independent, impartial and specialized receipt of messages, as well as confidentiality and anonymity. All incidents are monitored by the Ethics Committee and protection of complainants is guaranteed.

We believe that it is our duty as citizens to be aligned with principles that strengthen transparency and ethics, collaborating for an increasingly just society. We strengthen this commitment on a daily basis, so that all those involved in ZAGOPE's operations shall follow the same principles together.