



RELATIONSHIP WITH
BUSINESS PARTNERS

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INTRODUCTION

Andrade Gutierrez believes that preserving and fostering ethical principles in the markets where it operates is crucial to give more solidity to the bases of its growth and ensure its perpetuity. Andrade Gutierrez's reputation is one of its most valuable assets, built on the application of our principles and values, all present in our culture.

Thus, our Business Partners ("partners") will guide their conduct in compliance with the provisions of this standard, while preserving our corporate identity and ensuring the full application of the guidelines contained herein.

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COMPLIANCE WITH THE LAWS AND APPLICATION OF THIS STANDARD

ANDRADE GUTIERREZ IS COMMITTED TO MAINTAINING THE HIGHEST STANDARD OF ETHICAL CONDUCT, WITH STRICT COMPLIANCE WITH THE STANDARDS OF EACH MARKET IN WHICH IT OPERATES

It is crucial that all partners know this standard, make a commitment to complying with it, and observe the practices contained therein, thereby preventing the occurrence of legal, ethical or conduct violations that may compromise the integrity and reputation of Andrade Gutierrez.

Andrade Gutierrez will only relate to Partners who:

- Comply with the applicable legislation in the development of their activities and fulfill their contractual commitments; and
- Maintain appropriate secrecy regarding confidential information they may acquire in the activities performed for or in conjunction with Andrade Gutierrez.

This standard applies to all Andrade Gutierrez business partners.



THE PARTNER MUST:

- Make a commitment to complying with the guidelines of this standard;
- Comply with the legislation applicable to its business;
- Comply with the agreement established with AG;
- Comply with the standards and other regulations applicable to their activities.

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COMPLIANCE WITH GUIDELINES AND AGREEMENTS

ANDRADE GUTIERREZ HAS DIFFERENT GUIDELINES SET OUT IN ITS POLICIES, STANDARDS AND PROCEDURES, WHICH SHOULD BE KNOWN AND FOLLOWED BY PARTNERS WHEN CONDUCTING THEIR ACTIVITIES, WHERE APPLICABLE.

Additionally, the obligations assumed in the agreement should be fully met, with the commitment to delivering the agreed results.

Possible specific rules and guidelines may apply, depending on the nature of the contracting and business requirements.

Andrade Gutierrez's Compliance Guidelines are based on international standards ISO 19.600:2014 (Compliance Management System) and NBR ISO 37.001: 2017 (Anti-Bribery Management System), deployed to business partners through our processes.



THE PARTNER MUST:

- Know and comply with the guidelines established and applicable in the AG policies, standards and procedures, in addition to the obligations assumed in the agreement.

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HUMAN RIGHTS AND WORK ENVIRONMENT

ANDRADE GUTIERREZ'S RELATIONSHIP WITH ITS PARTNERS SHOULD BE BASED ON THE PRINCIPLES OF MUTUAL TRUST, RESPECT, AND THE AWARENESS OF TREATING OTHERS WITH DIGNITY.

Andrade Gutierrez does not tolerate any form of violation of human rights, whether in the form of prejudice, discrimination or harassment, in the relationship between its employees and partners, or based on race, color, religion, political affiliation, nationality, gender, orientation, age, physical condition, or any other characteristic. Andrade Gutierrez does not allow its partners to conduct campaigns or actions related to political or religious issues in Andrade Gutierrez's work environment.

Andrade Gutierrez is committed and demands the same attitude of its partners in support of social responsibility actions and promotion of sustainable development, respecting human rights, not tolerating the use of child or forced labor at any level of its organization or its supply chain.

The work environment at Andrade Gutierrez and its partners must be

maintained in accordance with the rules and best practices of social responsibility and occupational health and safety, as applicable.



THE PARTNER MUST:

- Respect everyone;
- Be honest in its relationships;
- Cultivate friendly relationships.



THE PARTNER MUST NOT:

- Conduct campaigns or actions of a political or religious nature in the work environment of Andrade Gutierrez;
- Engage in offensive playful behavior, as well as inappropriate jokes and use of profanity;
- Embarrass, threaten or invade the privacy of co-workers.

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ENVIRONMENT

ANDRADE GUTIERREZ SEEKS TO ENSURE THE RESPONSIBLE USE OF NATURAL RESOURCES AND ENCOURAGES ITS BUSINESS PARTNERS TO PURSUE SUSTAINABLE SOLUTIONS FOR THEIR ACTIVITIES WITH THE LESS POSSIBLE IMPACT ON THE ENVIRONMENT.

All partners must act responsibly, identifying and preventing environmental hazards in the course of their activities, immediately reporting to appropriate instances within their respective organizations and public authorities of any claims that may cause damage to the environment.



THE PARTNER MUST:

- Respect the legal requirements related to the environment;
- Report any environmental incident or accident related to its contract with AG.



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OCCUPATIONAL HEALTH AND SAFETY

ANDRADE GUTIERREZ, IN THE RELATIONSHIP WITH ITS BUSINESS PARTNERS, PRIORITIZES BEHAVIOR IN RELATION TO HUMAN RIGHTS, THE ENVIRONMENT, AND OCCUPATIONAL HEALTH AND SAFETY.

For this purpose, it has processes aiming to comply with the legislation and best work practices. Similarly, it demands this attitude from its partners.

The actions implemented provide a safe premises that ensure the well-being of its employees, considering the risks involved in our business.

Partners must be committed to supporting and implementing occupational health and safety actions to ensure compliance with the objectives of AG.



THE PARTNER MUST:

- Ensure a safe and healthy work environment, preventing injuries and illness for all employees;
- Ensure compliance with applicable legal, regulatory and other requirements of the occupational health and safety regulatory standards;
- Be aware of the dangers and risks of its activity;
- Be aware of risk situations in their activities in the work environment.

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MARKET AND PRESS COMMUNICATION

ANY FORM OF COMMUNICATION WITH THE EXTERNAL PUBLIC THAT EXPOSES STRATEGIC OR BUSINESS PLANS, RESULTS, CONFIDENTIAL INFORMATION, OR THE NAME AND IMAGE OF ANDRADE GUTIERREZ, SHOULD BE CARRIED OUT BY BUSINESS PARTNERS ONLY AFTER OBTAINING CONSENT.

Similarly, the partner may not make any statement, whether written or oral, online or in print, on behalf of the AG without prior authorization.



THE PARTNER MUST:

- Request authorization when conducting any form of communication with the external public on behalf of AG.



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SOCIAL MEDIA

ANDRADE GUTIERREZ ACKNOWLEDGES THE ROLE SOCIAL MEDIA
IN TODAY'S COMMUNICATION AND IN SOCIETY.

Business partners must protect confidential information and use
common sense when engaging in social media.



THE PARTNER MUST:

- Use your social network to post photos, videos or comments about your work with AG positively, after authorization.



THE PARTNER MUST NOT:

- Disclose on its social network confidential information, including financial and/or legal matters, prices, proposals, and other sensitive matters relating to the relationship with Andrade Gutierrez;
- Speak on behalf of Andrade Gutierrez in any media outlet, including social networks, without prior authorization;
- Post photos or videos of co-workers in their relationship with Andrade Gutierrez without permission.



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ANDRADE GUTIERREZ ACCOUNTING AND FINANCIAL RECORDS

BUSINESS PARTNERS MUST KEEP A TRANSPARENT, UP-TO-DATE AND ACCURATE ACCOUNTING FINANCIAL LEDGER AND RECORD SYSTEM AT ALL TIMES, STRICTLY COMPLYING WITH THE LEGISLATION AND APPLICABLE REGULATORY STANDARDS.

No economic, financial or asset operation involving any partner may be performed outside the commercial or fiscal ledgers.



THE PARTNER MUST:

- Ensure that accounting and financial records and reports reflect reality;
- Perform accounting and financial records and controls in accordance with the applicable legislation.

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CONFLICT OF INTERESTS

CONFLICT OF INTERESTS OCCUR WHEN A PERSON, INCLUDING BUSINESS PARTNERS, USES THEIR BUSINESS TITLE, ROLE OR BUSINESS POSITION TO OBTAIN AN UNDUE, DIRECT OR INDIRECT ADVANTAGE FOR THEMSELVES, IN CONFLICT WITH THE INTERESTS OF THE PARTIES INVOLVED, INCLUDING BRIBERY.

For Andrade Gutierrez, the mere appearance of a conflict of interest can damage both its reputation and its business regarding a concrete situation.

Business partners are prohibited, to perform any bribery practices, from receiving and granting any undue payment or advantage, including, without limitation, currency, gifts, meals, lodging, and entertainment, in violation of the applicable legislation.

Business partners should strive to protect of Andrade Gutierrez's material and intellectual property, using the equipment and media available only for professional activities and in accordance with the internal standards, avoiding waste and misuse of resources, equipment or services for personal purposes or for purposes that are incompatible with the interests of the parties involved.



THE PARTNER MUST:

- Report any kinship or close relationship with Public Officials, Politically Exposed Persons (PEP), and/or employees of AG.

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SECRECY OF CONFIDENTIAL INFORMATION

A LARGE AMOUNT OF INFORMATION IS CONFIDENTIAL, FOR WHICH IT CANNOT BE DISCLOSED, WHETHER DUE TO THE APPLICABLE LEGISLATION OR COMMITMENTS ASSUMED.

All information and data that may circulate must be safeguarded and kept confidential between AG and business partners. Know-how and property rights and the duty of confidentiality must be respected even after business partners are no longer related to Andrade Gutierrez.

All business partners who have access to inside information are required to maintain confidentiality regarding such data.

Classified information is considered as any information that may materially influence: (i) confidential information by virtue of a contractual obligation; or (ii) any strategic information, including information that may affect Andrade Gutierrez's competitiveness in bidding processes.

Only formally authorized business partners may speak publicly to

provide information, always in compliance with the confidentiality obligations, where applicable.



THE PARTNER MUST:

- Maintain the secrecy of confidential information, in compliance with the applicable legislation and signed commitments.



THE PARTNER MUST NOT:

- Share confidential information from Andrade Gutierrez or its partner companies;
- Talk about confidential matters in public places;
- Use AG information and content for private or third-party matters without due authorization.



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RELATIONSHIP WITH THE GOVERNMENT

IT IS CONSIDERED A BRIBERY SITUATION AND IT IS EXPRESSLY PROHIBITED FOR ANY BUSINESS PARTNER TO OFFER, PROMISE, AUTHORIZE, ACCEPT, OR GIVE, DIRECTLY OR THROUGH THIRD PARTIES, ANY UNDUE ADVANTAGE OF ANY KIND, WHETHER IN CASH OR THROUGH ANY VALUABLE ASSET OR SERVICE, TO POLICY OFFICIALS, POLITICAL PARTIES AND ITS MEMBERS, OR ANY CANDIDATES FOR PUBLIC OFFICE IN BRAZIL OR ABROAD, AS WELL AS REPRESENTATIVES OR FAMILY MEMBERS OF ANY PERSONS, IN ORDER TO OBTAIN A PERSONAL BENEFIT OR ANY BENEFIT FOR ANDRADE GUTIERREZ.

Regarding the offering and receipt of gifts, presents, entertainment or any similar benefit to public officials, in the relationships of partners involving AG, they can only be performed if they do not exceed the amount of one hundred Brazilian reais (R\$100.00) or the equivalent amount in the local currency.

Public officials, both in Brazil and abroad, are candidates for public office; people in diplomatic positions and in international organizations; employees of companies directly or indirectly controlled

by public entities, domestic or foreign; and private utilities acting as concessionaires or permit holders of public services.



Political donations by any Andrade Gutierrez association are prohibited. Business partners may donate from their own resources, provided that such donation is made in compliance with the applicable legislation, without any involvement or affiliation of Andrade Gutierrez.



THE PARTNER MUST:

- Protect Andrade Gutierrez from any connection with political and partisan positions;
- Consult Andrade Gutierrez's Compliance area with any questions regarding the relationship with Public Officials arising from its contract.



THE PARTNER MUST NOT:

- Practice bribery, and that means, offer, promise, authorize or give any undue advantage to Public Officials or related persons;
- Offer or accept from public agents any gifts, presents, entertainment, meals or any similar benefit exceeding one hundred Brazilian reais (R\$100.00) or the equivalent in the local currency;
- Provide or accept entertainment and hospitality to Public Officials for tourism purposes;
- Contribute with any resources to the practice of acts that may be considered harmful to the direct or indirect public administration, domestic or foreign;
- Use an intermediate to conceal or disguise acts harmful to the direct or indirect public administration, domestic or foreign;
- In any case, defraud, manipulate, or illegally interfere with public tenders and bids.



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COMPLIANCE WITH ANTITRUST STANDARDS

BUSINESS PARTNERS MUST ALWAYS ACT INDEPENDENTLY IN RELATION TO THEIR COMPETITORS, WHETHER IN THE PRIVATE SECTOR OR IN NEGOTIATIONS INVOLVING THE DIRECT OR INDIRECT PUBLIC ADMINISTRATION.

Partners must comply with antitrust standards, and any acts aimed at limiting, distorting or otherwise harming free competition, arbitrarily increasing profits or abusing a dominant position are prohibited.

When dealing with their competitors, business partners must be aware of antitrust standards, and any agreements and/or exchanges of commercially sensitive confidential information (e.g. price, costs, margins, business, or investment plans) with competitors are strictly prohibited, as well as any understandings and/or agreements between competitors, express or implied, that may give rise to or influence, directly or indirectly, the pricing, readjustments, discounts, production quotas and/or sale conditions, market division or customers, among

other measures that may limit or restrict free competition in the market in any way.

Any practices that may constitute unfair competition are equally prohibited.



THE PARTNER MUST:

- Negotiate in good faith in compliance with the current legislation and the internal guidelines of Andrade Gutierrez;
- Refuse to receive confidential information about competitors and about Andrade Gutierrez.



THE PARTNER NOT MUST:

- Agree, combine, manipulate or adjust with a competitor, in any form, prices, division of parts, or segments of a market;
- Harm or defraud, by adjustment, combination or otherwise, the competitive nature of public or private bidding proceedings;
- Prevent, disrupt or defraud the performance of any act involving bidding proceedings.

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NONCOMPLIANCE WITH THE BUSINESS PARTNER RELATIONSHIP STANDARD

NONCOMPLIANCE WITH THE PRINCIPLES AND GUIDELINES SET FORTH IN THIS STANDARD MAY RESULT IN TERMINATION OF CONTRACTING AGREEMENTS. THE FULFILLMENT OF THIS STANDARD IS AN ESSENTIAL CONDITION FOR REMAINING AS AN AG BUSINESS PARTNER.

Andrade Gutierrez reserves the right to terminate immediately all agreements with the Business Partner that violate the applicable law or any requirement of this standard. Identified violations will be reported to the relevant public authorities, where appropriate.



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COMMUNICATION CHANNELS

BUSINESS PARTNERS MAY USE THE “CONTACT US” COMPLAINT AND REPORTING CHANNEL TO RECORD POSSIBLE VIOLATIONS OF THIS BUSINESS PARTNER RELATIONSHIP STANDARD.

Andrade Gutierrez ensures complete anonymity, confidentiality and non-retaliation to the persons filing reports in good faith, the channel being operated by an independent, specialized company.



THE PARTNER MUST:

- Report whenever it suspects or witnesses a violation of the standard.



THE PARTNER MUST NOT:

- Report incorrect or untrue facts on Andrade Gutierrez 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



INTERNET

andradegutierrez.com/faleconosco



COMMITMENT AGREEMENT

ANDRADE GUTIERREZ GROUP

I hereby declare that: (a) I have received, read and understood the **Andrade Gutierrez Business Partner Relationship Standard**; (b) I fully agree with the rules and guidelines contained therein; and (c) I undertake to comply fully therewith.

Company:

CNPJ: _____

Company Representative Name: _____

Company Representative Title: _____

Signature: _____

Date: / /

