

COMPLIANCE POLICY

ZAGOPE – CONSTRUÇÕES E ENGENHARIA, S.A. (ZAGOPE) operates in market research, prospecting, business development, technical proposal preparation, and the execution of civil construction and renewable and industrial energy generation works.

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

The Corporate Governance structure comprises the AG S.A. Board of Directors, Ethics Committee, ZAGOPE Management, and Corporate Affairs Directorate.

It is noted that the Compliance and Internal Audit functions report directly to the Ethics and Audit Committees of AG S.A., respectively, and to the AG S.A. Board of Directors, thereby ensuring their autonomy and independence.

In all markets where it operates, ZAGOPE considers the following to be essential to the development of its business:

- The strict observance of ethical principles, including the prohibition of corrupt practices or the promotion of acts of corruption, bribery, related offenses, money laundering, and terrorist financing;
- The management of risks related to bribery, corruption, related offenses, money laundering, and terrorist financing;
- Compliance with legal requirements, including anti-bribery laws and the requirements of Anti-Bribery Management System standards;
- The continuous improvement in the management and performance of its processes and products;
- Ensuring appropriate handling of legal, ethical, or conduct violations;
- Fostering a positive market and societal reputation in terms of Compliance and Integrity;
- Embedding a culture of Compliance and Integrity in day-to-day operations and at all levels.

ZAGOPE considers ethics to be the fundamental basis of its operations and its relationships with stakeholders; accordingly, its Code of Ethics and Conduct applies to all employees and partners.

The key pillars are Senior Leadership commitment and Compliance Actions, including culture reinforcement through training and awareness-raising.

COMPLIANCE POLICY

All employees, business partners, or any other interested party must report any intended or actual violation of the Code of Ethics and Conduct, as well as of Compliance guidelines, including those relating to fraud, corruption, related offenses, money laundering, or any conduct associated, directly or indirectly, with terrorist entities or that may target or support terrorist activities. Confirmed cases of noncompliance with any of these items will be subject to the penalties and disciplinary measures set forth in the Code of Ethics and Conduct.

Whistleblowing Channel “Talk to Us”

The “Talk to Us” communication channel is the vehicle for reporting complaints or concerns about misconduct, bribery, fraud, or violations of the Code of Ethics and Conduct, encouraging the raising of concerns in good faith, on solid grounds, in complete confidence, and without fear of retaliation.

This channel can be accessed by any person (employees or members of the public in general) through the Andrade Gutierrez website or by phone.

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

We believe it is our obligation as citizens to uphold principles that strengthen transparency and ethics, contributing to an increasingly just society.

We reaffirm this commitment every day so that all those involved in ZAGOPE’s operations stand united by these same principles.

Any breach of the duties set forth in our Code of Ethics and Conduct may give rise to disciplinary or criminal liability associated with acts of corruption and related offenses, in accordance with the penalties applicable to corruption and related offenses as provided for under Decree-Law No. 48/1995 of March 15, as amended by Law No. 15/2024 of January 29, currently in force.

Find out more at <https://www.zagope.pt/sustentabilidade/>.