



REGULATION

Ref no.: Z/09/2019

POLICY OF USING SOCIAL MEDIA BY MECE EMPLOYEES



Purpose

Due to the activity of the employees on social networks, internet forums and other platforms for the exchange of information, the Management Board of Mota-Engil Central Europe S.A. confirmed the guidelines for using the social media.

These rules are aimed at reducing threats arising from the making public of the information which could constitute a trade secret of Mota-Engil Central Europe S.A. or the disclosure of which could expose Mota-Engil Central Europe S.A. to damage, and whose purpose is also to have support from the employees in co-creation of the positive image of the company.

The company respects the right of an individual, including those concerning his privacy and freedom of speech. However, information published via the social media in an unskilful, simplistic or inappropriate manner may create conflicts and cause harm to the reputation of MECE.

In accordance with the Article 100 §2 point 4 of the Labour Code, an employee is in particular obliged to care for the good of the employing company and maintain the secrecy of the information the disclosure of which could expose the company to damage.

Furthermore, the policy of using the social networks is aimed at:

- preventing the disclosure of confidential business information on Mota-Engil Central Europe S.A. via the social media;
- establishing the persons and organisational units authorised to communicate on behalf of the company on the social media;
- indicating the risks associated with the activity of an employee on the social media.

The duty of each employee is to familiarise oneself with and adhere to the guidelines. If in doubt or if you have any questions concerning the application of this policy, please contact the Communication and External Relations Department: communication@mota-engil-ce.eu



Rules of using the social media

1. Basic principles of the policy

- Each employee should bear in mind that the information posted on the social media remain in public domain even after its deletion; therefore one should care for privacy protection and confidentiality principles which apply to all the employees.
- While discussing subjects associated with the Mota-Engil Central Europe S.A. company, it is important to remember to give your full name, and if appropriate, a function in the company.



One should clearly imply that he makes a statement for himself and not on behalf of Mota-Engil Central Europe S.A. In cases where the good reputation of the company has been damaged, such fact should be reported to the Communication and External Relations Department.

- If an employee posts on his personal profile contents online which may be associated with MotaEngil Central Europe S.A., he should for his security use the following clause: "The views and contents posted on this website are my personal opinions and not the official position of the MotaEngil Central Europe S.A. company".
- One should respect copyrights, fair use and the provisions on the disclosure of financial information.
- It is prohibited to make available confidential or proprietary information about Mota-Engil Central Europe S.A. or its clients, partners or suppliers. One should not discuss publicly the financial performance of Mota-Engil Central Europe S.A. or other confidential issues concerning the company's business activity or plans.
- One should not quote or refer to the clients, partners or suppliers in business matters without their consent. In case consent has been obtained, one should place a link to the source. It is prohibited to publish contents which could lead to drawing conclusions that might harm the relations between Mota-Engil Central Europe S.A. and its contractors.
- Each user of the social media should respect his receivers. One should not make insults, discriminatory remarks, personal abuse, vulgarisms, or show other similar behaviour unacceptable at the workplace.
- Unauthorised use of the logo and trademarks of Mota-Engil Central Europe S.A. is prohibited. One may use them only where a user has been authorised to do so.

2. Detailed principles of the policy

2.1. Official representatives of the company on the social media

Creation of a company account or giving of the status of an official representative of the company on the social media require consent from the Management Board in consultation with the Communication and External Relations Department Manager. Only such accounts may use the company's logo in visual identification.

Each employee may make available on his profiles the contents posted on the official profiles of Mota-Engil Central Europe S.A., provided that it will not modify the meaning of the originally posted material through adding one's own contents.



2.2. Confidentiality

The employees are obliged to protect the confidential information concerning the Mota-Engil Central Europe S.A. company and its clients and associates, and not to use photographs, personal data or other information about the associates without their consent. Furthermore, the employees may not Kraków, 16.12.2019 Mota-Engil Central Europe S.A. Strona 8 z 10 publish internal reports, rules, procedures or other confidential internal communications associated with the activity of the company.

One should not use external social platforms to publish confidential information about a client, company or supplier, even if it concerns a controlled, close-knit community to which access is limited, and despite such platform itself having safeguards at an appropriate level.

2.3. Copyrights

One should abide by the law with respect to the protection of intellectual property, including copyrights, patent law and trademarks protection, and not publish any content which could infringe the intellectual property rights of Mota-Engil Central Europe S.A. or of any other entity. In order to protect the rights and image of Mota-Engil Central Europe S.A. and to protect oneself, one should duly respect the copyrights to and fair use of the materials protected by copyright belonging to other entities. One should never quote more than short passages from works protected by copyright belonging to other entities. To this end, one should build links to the works of other persons in sharing the information on the social media.

2.4. Using the social networks while at work

Company data communication networks, internet connections and computers may be used only for professional purposes.

2.5. Professional image

One should remember that persons identifying in the web as an employee of Mota-Engil Central Europe S.A. may be observed by other associates and clients of the company. Therefore, one should take care that the contents associated with such a profile are consistent with the values and principles of Mota-Engil Central Europe S.A.

One should bear in mind that identification on the social media as an employee of Mota-Engil Central Europe S.A. ought to involve a properly filled-in profile with authentic data.

2.6. Posting photographs from the workplace

The photographs which the employees post on the social media are part of the created image of the employer; therefore one should see to it that the photos do not include confidential information inconsistent with the internal rules of the company or do not depict persons who did not agree to their images being published. In case such a photograph has been published,



one should obtain consent from his superior or the Communication and External Relations Department, both of which will assist in assessing whether the photograph may be posted in the web.

2.7. Responsibility and conduct

It is important to remember that without appropriate authorisation an employee may make statements on the social media for himself and not on behalf of Mota-Engil Central Europe S.A.; therefore one should use the first person singular.

In case of a discussion on the subjects associated with the company, one should clearly give his full name and the name of his position. If contents or materials which could be associated with the company's activity have been published, one should add an annotation: "The views and contents posted on this website are my personal opinions and not the official position of the Mota-Engil Central Europe S.A. company".

2.8. Monitoring

Mota-Engil Central Europe S.A. may monitor the social platforms and take appropriate actions in relation to activities which could harm the effectiveness of the employees while at work or damage the company's reputation outside.

2.9. Crises management

In case a threat has been identified arising from the activity of other users who act to the detriment of the company, such a fact should be reported to the Communication and External Relations Department to the address communication@mota-engil-ce.eu



Official accounts of Mota-Engil Central Europe S.A.

The Mota-Engil Central Europe S.A. company holds official accounts on the social media which are managed and supervised by the Communication and External Relations Department. They include:

- Facebook - <https://www.facebook.com/motaengilCE/>
- LinkedIn
Company account - <https://www.linkedin.com/company/mota-engil-central-europe/>
HRD account - <https://www.linkedin.com/in/hr-development-mota-engil-ce/>
- YouTube - <https://www.youtube.com/user/MotaEngilCE>
- Instagram - <https://www.instagram.com/motaengilcentraleurope/?hl=pl>

The information on the official accounts are also available on the company's website.





Infringement of the policy

An employee is obliged to adhere to the principles and fulfil the duties arising from this policy. Failure to abide by this policy may lead to financial losses or damage to the reputation of the company or to imposition of penal or civil law sanctions on an employee or the company.

Irregularities in using the social media should be reported to the Communication and External Relations Department.

The Mota Engil Central Europe S.A. company's objective is to make every effort in order to prevent conduct contrary to this policy, and if such conduct has been identified - to interrupt it as soon as possible.

The employees who infringe the company's policy shall be subject to an appropriate disciplinary procedure which may result in terminating the employment contract with notice or with immediate effect.

