

# THIRD PARTY CONDUCT PRINCIPLES FOR ENTITIES COOPERATING WITH COMPANIES OF MOTA - ENGIL CENTRAL EUROPE S.A. GROUP

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## PRINCIPLES OF CONDUCT FOR THIRD PARTIES

The Capital Group of Mota - Engil Central Europe S.A. (hereinafter the "Group") conducts and develops its activities striking a balance between business aspects, ethics and respect for the natural environment. Our goal is not only to comply with laws, rules and regulations regarding our activities, but also to strive to achieve high standards of business conduct.

**These Principles of Conduct for Third Parties were created based on the most important values and rules implemented in the Mota-Engil Central Europe**

It is important for the Group that the Third Parties with which it conducts business relations act honestly, in compliance with applicable laws and regulations, and that they comply with all applicable requirements and internal regulations regarding standards of ethical conduct, anti-corruption, conflict of interest, giving and receiving gifts, and reporting and explaining potential or actual irregularities in the above aspects.



### THIRD PARTIES DEFINITION

The Group's Third Parties are: clients, suppliers, subcontractors, consultants, agents and all individuals, corporations, companies, business partners, limited liability companies, associations, consortium members or other entities that are not subsidiaries and provide services on behalf of and for the Group.

**The Group's goal is to conduct transparent business relations with each of the entities with which the Group cooperates regardless of any type and scope of operations.**

## 1. THE KEY STANDARDS FOR THIRD PARTIES

The Third Party undertakes to pursue its business objectives with respect for the law, ethics and human rights and public freedoms, in particular by applying the basic standards of conduct set forth in these Principles.



## WORKING RELATIONS

**The Third Party is responsible for providing an ethical and safe work environment.**

- Commits to treating its employees fairly, with respect employees' rights and protect their personal data and privacy.
- Responds to all signs of discrimination and mobbing by ensuring equality in the treatment of employees and zero tolerance for any violence against employees.
- Commits itself to the absolute observance of the principles of health and safety at work by providing employees with personal protective equipment and observing the rules in all places where it conducts its business.
- Shall endeavor, as far as possible, to avoid the use of environmentally harmful technologies, to conserve natural resources and to influence environmental protection.
- Commits the absolute prohibition of child labor and forced labor.



## EXTERNAL RELATIONS

**The Third Party is responsible to conduct transparent business relations with each external entity.**

- Confirms that it will conduct its business in an honest and lawful manner and will not tolerate any form of corruption, bribery, money laundering or financing of terrorism,
- Declares that in any circumstances its employees will not expect, give or promise any illicit benefit in business transactions with any external entity.
- Declares that in any circumstances its employees should not offer illegal benefits to government officials, persons holding prominent positions, politically exposed persons or entities owned by them.
- Declares that it do not take actions that constitute acts of unfair competition,
- Avoids situations that may constitute a potential conflict of interest,
- Declares that it conduct business with care for the environment and comply with applicable

environmental protection regulations. The Third Party avoids, as far as possible, the use of technologies harmful to the environment, protect natural resources.

- Takes responsibility for the entrusted assets, protecting them from any fraudulent and harmful use.



## FAIR PRACTICES

**The Third Party declares that it reads and undertakes to respect the internal regulations of Mota-Engil Central Europe S.A. Group and to comply with the standards of the Group described in the Code of Ethics and Business Conduct.**

*To be downloaded on the website:*

<https://mota-engil-ce.eu/our-values.php>

## 2. REPORTING OF VIOLATIONS

The Third Party and its Employees as well as other persons who cooperate with it on the basis of civil law contracts are obliged to report any violations of the rules, guidelines and regulations resulting from these principles so that appropriate remedial action can be taken.



The Third Party and its Employees may report violations by the internal channel available at:

<https://mota-engil-ce.eu/breaches-reporting.php>



or additionally, upon special request by the Contractor, the report may be performed by means of a face-to-face meeting to be arranged on a date acceptable to the Parties. For the meeting, please contact directly the Compliance Officer mobile no: **+48 694 442 894 on business days between 9:00 a.m. and 2:00 p.m.**

**In case of violation of these rules, Mota-Engil Central-Europe S.A. reserves the right to terminate the business relationship.**

## THIRD PARTY VERIFICATION PROCEDURE - MOTA-ENGIL PLATFORM

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Expecting its Third Parties to be integrate and act in accordance with applicable regulations, and in order to better understand its business partners, the Group has implemented a Third Party Verification Procedure.

**The main principles of the procedure include the following actions:**

1. Whenever any Group company considers establishing a new or repeated business relationship with an external entity, it should be verified that the entity is on the Group's integrated list of approved Third Parties.
2. In order for the Third Party be on the list of approved entities, it must successfully pass a business ethics review and assessment process by completing a questionnaire.
3. The questionnaire is sent to the Third Party via e-mail.
4. The questionnaire should be filled in and sent back to the Mota-Engil Group.
5. The entity's approval is valid for two years.
6. After this period the verification process will be repeated when considering extension of cooperation with a given Third Party.



COMPLIANCE  
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In case of questions please  
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[compliance@mota-engil-ce.eu](mailto:compliance@mota-engil-ce.eu)

or by letter:  
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