

COMPETITION AND ANTI-CORRUPTION COMPLIANCE POLICY

1. PURPOSE

Define standards of conduct and best practices to be followed by all employees within their respective positions, in order to disseminate and institutionalize a culture of compliance and transparency at Concremat Engenharia e Tecnologia.

2. SCOPE

This Organizational Guideline must be adhered to by all employees of Concremat Engenharia e Tecnologia and applies to all shareholders, investors, directors, advisory board members and committees, employees, agents, service providers and business partners, regardless of their hierarchy and position.

3. REFERENCE STANDARDS

Code of Conduct

DO 11 – Information Technology

4. DEFINITIONS AND ACRONYMS

Public Agent - (a) any appointed or elected officer, agent or employee of a national or international government, department, agency or public body, including companies wholly owned or controlled by the Government; (b) any individual holding a public office, job or position; (c) any candidate for political office; (d) any officer of political party; or (e) any political party.

Corruption - the abuse of power or authority by a person delegated with such authority or power to illegitimately gain private advantage. Corruption may be (a) active, whenever it involves the offer, promise or delivery of improper advantage; or (b) passive, whenever materialized through the solicitation, receipt or acceptance of improper advantage.

Money Laundering - the process by which an agent conceals or disguises the nature, origin, location, movement, or ownership of property, rights, or proceeds, directly or indirectly, from criminal offense so that the source of these financial resources appears lawful and legitimate.

Anything of Value - any gifts, payments, actions, meals, travelling, accommodations, entertainment (such as tickets and invitations), donations or sponsorships.

Bribery - the offer, promise, delivery, acceptance or solicitation of any improper advantage, such as money, bribe, kickback or gift, as a means of inducing an illegal act or breach of trust.

Unfair Advantage - any payments or benefits delivered in an irregular manner intended to (a) influence a desired action; (b) induce an action in violation of a regular obligation; (c) cause a person to refrain from acting in violation of a regular obligation; (d) obtain preferential treatment or guarantee of business or political concessions; or (e) obtain confidential information about business opportunities.

5. SPECIFIC GUIDELINES

In carrying out the business of Concremat Engenharia e Tecnologia and, in particular, in hiring any third party, the employees must comply with the following basic principles:

- a) Act with ethics, responsibility, honesty, transparency, fairness, commitment, respect, loyalty, discipline, impartiality, expertise and common sense;
- b) To act preserving and protecting the name, image, property and reputation of Concremat Engenharia e Tecnologia;

- c) Avoid situations of conflict between the interest of the employees and the interest of Concremat Engenharia e Tecnologia; and
- d) Respect and adhere to the rules set forth in Applicable Laws and this Guideline.
- e) Concremat Engenharia e Tecnologia shall not authorize, tolerate or condone any practice that is in disagreement with this guideline and the Applicable Laws, and shall take appropriate action against possible irregularities it becomes aware.
- f) All Employees shall read, understand and comply with the rules and principles set forth in the Policy, expressly provided in Annex A – Compliance Commitment Term.

This Policy is not intended to provide answers to all questions that may arise in the course of the business transactions of Concremat Engenharia e Tecnologia. Therefore, whenever there is any doubt about the application of the Policy, the Employee should seek guidance from the Compliance Department.

6. COMPLIANCE DEPARTMENT AND ETHICS COMMITTEE

The Compliance Area is a section of the Legal Department and is composed of a body of compliance agents, including a manager, who has autonomy to implement the necessary actions for the correct operation of this guideline and to propose improvement measures.

Among the duties of Compliance Area, we highlight (i) the supervision of compliance with the rules provided for in this guideline and applicable laws by Concremat Engenharia e Tecnologia and its employees; (ii) the receipt and investigation of complaints made by employees and/or third parties, (iii) the submission of identified irregularities to the Ethics Committee, (iv) the review and improvement of this guideline and other governance practices; (v) the development and application of training; and (vi) the coordination of audit work.

The Ethics Committee is the collegiate advisory body to senior management of Concremat Engenharia e Tecnologia, which has the following duties (i) the general orientation of the integrity program of Concremat Engenharia e Tecnologia; (ii) the consideration of cases of breach of Applicable Laws, the Code of Conduct and other internal policies of Concremat Engenharia e Tecnologia; and (iii) the imposition of penalties and disciplinary measures applicable to the authorized employees.

7. CONFLICT OF INTEREST AND CONFIDENTIALITY

Employees must avoid situations of conflict of interest and shall perform their duties in the best interests of Concremat Engenharia e Tecnologia. Accordingly, they shall not abuse their positions, misuse confidential information or engage in business that conflicts with the interests of Concremat Engenharia e Tecnologia.

The information received by employees in during their activities shall be kept strictly confidential and shall not be shared with third parties outside the business conducted by Concremat Engenharia e Tecnologia.

If disclosure of confidential information is required by public authorities upon reasonable request, the Compliance Area shall be notified immediately to allow access to the requested information.

Examples of confidential information include: (i) agreements entered into by Concremat Engenharia e Tecnologia or its customers; (ii) prices and proposals for services provided by Concremat Engenharia e Tecnologia; (iii) new projects or businesses prospected by Concremat Engenharia e Tecnologia; (iv) personal information of the employees; (v) corporate operations and business partnerships; and (vi) costs, margins and financial data of Concremat Engenharia e Tecnologia.

If a conflict of interest situation within the activities of Concremat Engenharia e Tecnologia is identified, it must be immediately notified by the Employee(s) to the respective direct supervisor(s) or directly to the Compliance Area, as appropriate, for further problem assessment and escalation.

The same applies to similar situations that could have any negative impact on the relationship of Concremat Engenharia e Tecnologia with its business partners and the market, such as the allegation of access to insider customer information, personal influence in the process of hiring services, or similar situations.

All cases of conflict of interest shall be properly reported and investigated and, if confirmed, the conflicting Employee shall be immediately removed from the conflicting relationship and another Employee shall be appointed to continue the activity.

Concremat Engenharia e Tecnologia shall keep in its files updated Employee records containing personal, family and social information, in order to identify possible situations that may give rise to a conflict of interest, including due to the relationships existing between such employees and public agents and customers of the company.

Concremat Engenharia e Tecnologia reserves the right to periodically review the records of Internet access, e-mails, data stored on computers and telephony resources of the Employees, in order to supervise the compliance of Employees with their confidentiality duties as provided herein, as well as compliance with the policies and values of Concremat Engenharia e Tecnologia provided in handbooks and internal policies.

8. ACCOUNTING RECORDS

Concremat Engenharia e Tecnologia shall comply with all rules applicable to the preparation of its financial statements, in accordance with accounting principles generally accepted in locations where it conducts business, and shall maintain books, records and accounts reflecting accurately all transactions and financial transactions.

Making false or misleading statements or omitting material facts to accountants or auditors regarding the preparation of the necessary records is prohibited, as well as the use of any other accounting procedure, technique or device that may conceal or otherwise cover illegal payments.

Concremat Engenharia e Tecnologia shall conduct periodic internal and external audits to verify compliance with the standards applicable to the preparation of its financial statements.

9. BEST COMPLIANCE PRACTICES

Within the scope of their duties, employees shall be guided by the best ethics and compliance practices, as well as the Code of Conduct, and also the guidelines provided below:

.Gifts and Business Courtesies: Business courtesies, such as meals, gifts, entertainments, shall not be received and/or offered to anyone, whether public or non-public, under circumstances that may give rise to the impropriety. The receipt and/or offering of any courtesy must be directly related to business discussions and the promotion of the services of Concremat Engenharia e Tecnologia. It is allowed to receive and/or offer only modest courtesies, as detailed in the compliance handbook and under no circumstances may be received and/or offered any money, even if negligible. If you have any questions, Employees shall contact the Compliance Area.

Hospitality: Concremat Engenharia e Tecnologia may pay for the travel and accommodation of anyone, whether a public agent or not, provided that such costs are strictly related to their activities and/or promotional visits. Hospitality expenses must be reasonable, and may not involve any extravagance, and shall be incurred in good faith. Additional travel or costs for spouses or travel companions shall not be borne or reimbursed under any circumstances. Concremat Engenharia e Tecnologia will not provide daily payments or cash distribution to cover meal and beverage expenses. Employees shall observe the Compliance Handbook and contact the Compliance Area if in doubt.

Political Contributions: Concremat Engenharia e Tecnologia shall not makes political contributions, so that employees may not directly or indirectly use Concremat Engenharia e Tecnologia resources, either through payments or gifts, for any political purposes. Employees, however, may make personal political contributions if they so wish, subject to the provisions of the relevant legislation.

Charitable Contributions and Sponsorships: Contributions to charities and sponsorships shall be handled with caution as they may be a conduit for illegal or corrupt payments. Therefore, employees may not use Concremat Engenharia e Tecnologia resources for charitable contributions or sponsorships, either in the form of money or anything of value, for the benefit of public or private agents, except with the prior

authorization of the Board of Directors and after a comprehensive investigation of the institutions. Employees shall adhere to the Compliance Handbook and contact the Compliance Area in case of doubts.

Due Diligence of Business Partners and Suppliers: Prior to engaging with any business partner or supplier, employees should conduct an appropriate level audit to assess potential risks of corruption and ensure that Concremat Engenharia e Tecnologia only initiates business relationships with reputable companies, individuals. Potential business partners and suppliers shall comply with the audit procedure recommended by the Compliance Area, as well as IP-CORP-SU-001 - Supplier Qualification.

Agreements with Business Partners and Suppliers: Concremat Engenharia e Tecnologia shall enter into written agreements with all business partners or suppliers of goods or services, as well as execute in writing, any understandings made with them for the provision and/or consideration, whether pecuniary or otherwise. The Agreements entered into by Concremat Engenharia e Tecnologia shall include provisions indicating that the business partner or supplier shall comply with the provisions set forth in this guideline and Applicable Laws, in accordance with the guidelines set forth in IP-CORP-SU-001 - Supplier Qualification.

Payments to Business Partners and Suppliers: Except as authorized by the Board of Directors, no payments shall be made to any business partner or supplier: (i) in cash, unless the contract under which payment is made requires payment in cash or the amount involved is small and is intended to reimburse costs incurred; (ii) with cashier checks or to third parties designated by the beneficiary; or (iii) to an individual, entity or account outside the recipient's country of residence. Employees must ensure that payments are properly documented so that the transaction can be correctly booked in the accounting records of Concremat Engenharia e Tecnologia.

Customer Due Diligence: Prior to contracting with any customer, employees shall conduct an audit at an appropriate level to identify the customer, set up its corporate registry assess the potential risks regarding the involvement of Concremat Engenharia e Tecnologia' in money laundering or concealment of assets.

Customer Relations: The relationships between employees and customers shall be initiated and conducted in an institutional and impersonal manner. Whenever possible, meetings with clients to discuss business matters or regarding the development of contracted services shall be attended by at least two employees.

Advances to Employees and Third Parties: Concremat Engenharia e Tecnologia may advance resources to employees and third parties to meet specific situations, including travel, food and transfer expenses, emergency purchases and implementation of services. The amounts advanced shall be reported, upon presentation of supporting documentation of expenses, in compliance with IP-CORP-FI-002 - Advances to Employees and Reimbursement of Expenses.

Mergers and Acquisitions: Prior to the completion of any merger or acquisition of other companies or business units by Concremat Engenharia e Tecnologia, an audit shall be conducted to identify their potential history of involvement with corruption or other illegal or unethical conduct. If there are indications of irregularities, the Executive Board shall decide on the execution of the operation and/or the adoption of actions to mitigate the identified risks.

Relationship with Public Agents: Employees must avoid contact with public agents leading to the offer or payment of improper advantages. Thus, in meetings with one or more public agents, the Employee shall: (i) involve, whenever possible, one or more Employees; (ii) inform the subject to the public agent in advance and the interest involved; and (iii) limiting itself to dealing with matters within the scope of the Employee, respecting the limits of its position. Documents that may be presented to public agents in the context of ongoing inspections, processes or procedures must be validated by the Employee or Employees responsible for the area(s) or department (s) involved.

10. WARNING SIGNS

When in doubt about a course of action, employees shall ask whether their conduct in that particular case could: (i) be considered lawful; (ii) be considered ethical; (iii) be considered compatible with this guideline; and/or (iv) reflect positively on Concremat Engenharia e Tecnologia or themselves. If the answer to any of these questions is "no" then conduct shall not be performed. If there is any doubt about how to handle the situation, the Compliance Area shall be available to assist the employees.

“Warning Signs” shall be deemed to exist whenever any fact or circumstance suggests that a particular transaction, relationship or contract involves a potential risk of non-compliance with Applicable Laws. When identifying a "Warning Sign", careful consideration shall be given to the steps to be taken to minimize or eliminate the risk that that particular relationship may present to Concremat Engenharia e Tecnologia.

Some examples that may indicate practices contrary to this guideline, or represent common areas of corruption-related risks are provided below:

- a) A request for payment in advance or prior to the award of a concession, contract or other business;
- b) A request for payment of cash to a current account or to an account in the name of a different person;
- c) A request for payment in a different country, especially if it is a country with poor financial transparency or considered a “tax haven”;
- d) A request for payment of substantial contingency or "success" fees;
- e) A request for payment of commissions or fees exceeding the usual fee for similar services in a given territory, or unreasonably exceeding the fees paid by Concremat Engenharia e Tecnologia for similar services elsewhere;
- f) The provision of extravagant or expensive gifts involving a public agent or private entity;
- g) A claim for reimbursement of improperly documented extraordinary expenses or last-minute expenses;
- h) The business partner has a poor business reputation;
- i) The commercial agent has a family member in a government position, particularly if such a family member is in a position to direct business to Concremat Engenharia e Tecnologia;
- j) The business partner has been nominated and recommended by a public agent;
- k) The business partner holds private meetings and often with public agents;
- l) A refusal by any business partner to disclose the identity of its partners or directors;
- m) The use by the business partner of a shell company (without commercial substance) or holding company hiding its ownership without a plausible explanation;
- n) The business of the partner appears to lack labor, equipment and/or experience, or otherwise the partner shall not be able to fulfill the proposed business relationship;
- o) The business partner is insolvent or in significant financial difficulty in connection of which business implications can reasonably be expected;
- p) The business partner shows ignorance or indifference to local laws and regulations;
- q) The business partner does not have an adequate compliance program in place or refuses to adopt one;
- r) The business partner has been recently incorporated or otherwise has no historical information;
- s) Information provided about the business partner or its services is not formally registered and is only made available informally;
- t) The business partner's plan for the provision of its services is vague and/or suggests a dependency on contacts or relationships;
- u) The performance of the business partner is suspiciously higher than that of competitors or companies in related industries;
- v) A business or banking contact of the trading partner unjustifiably refuses to answer questions or give business references, or provides problematic answers; or
- w) The business partner is involved in cases of corruption, crimes and misdemeanors in general or other legal violations deemed relevant, is under investigation by government agencies (prosecutors, courts of law and police) or is subject to plausible media exposure indicating misconduct.

x) If the Employee becomes aware of any of these circumstances, or otherwise suspects them, or if he/she suspects violation of this Policy or indicates any irregularity in the business in which he/she participates, the Employee shall immediately inform the Compliance Area, through the communication channels provided by the company (see item 14 of this Policy), so that the corresponding facts and circumstances are investigated, and the identity and of the Employee and the contact with the Compliance Area may be preserved and the contact, if he/she so decide.

3. PROHIBITIONS AND RESTRICTIONS

It is strictly prohibited, subject to the applicable penalties, the practice of any of the following acts:

- a) Engage in conduct that constitutes or contributes to money laundering or corruption in any form, including through bribery;
- b) Promise, offer, make or authorize the delivery of money or anything of improper value or advantage, directly or indirectly, to any person, whether public or not, for obtaining or maintaining business in an irregular manner;
- c) To embarrass in any way inspection actions promoted by public agents in the exercise of their control duties;
- d) Finance, fund, sponsor or otherwise support the performance of unlawful acts provided for in the Applicable Laws;
- e) To use an interposed person to conceal or disguise interests or the identity of effective beneficiaries; and
- f) Use any form of resources of illicit origin.

With regard to bids and contracting with the public administration, the practice of any conduct tending to:

- a) To frustrate or defraud by adjustment, combination or other expedient, the competitive nature of the bidding process;
- b) Prevent, disturb or obstruct the performance of any bidding procedure;
- c) Fraud in bidding or agreement arising therefrom;
- d) Obtain, improperly or fraudulently, modifications or extensions of public contracts, without authorization by law, in the bidding notice or in the respective contractual instruments;
- e) Manipulate or defraud the economic and financial balance of public procurement; and
- f) Hinder or obstruct investigative or supervisory activity of public agencies or agents.

Concremat Engenharia e Tecnologia ensures the maintenance and preservation of the economic order and the competitive nature of public and private tenders. Accordingly, Employees are prohibited from engaging in acts that have the purpose or that may produce any of the effects listed below:

- a) Limit, distort or in any way impair free competition or free enterprise;
- b) Dominate artificially the relevant market (i.e., without the domain resulting from the natural process of quality and efficiency gain); and
- c) Fictitiously increase the profits of Concremat Engenharia e Tecnologia.

12. TRAININGS

Concremat Engenharia e Tecnologia maintains a compliance training program for its employees, through which periodic courses are offered and further clarifications regarding this guideline, as well as other internal rules and applicable laws and the Code of Conduct.

The compliance training program includes discussion of concepts and theoretical and practical issues related to compliance, anti-corruption and competition, with the purpose of preparing and keeping all employees updated on the best governance practices and their expected behaviors to face situations involving potential irregularities.

The participation of all employees in the training cycles promoted by the Compliance Area, under the direct coordination of Executive Board, is mandatory, according to the programs and schedules that are periodically developed by the Compliance Area, and the participation of employees in such training cycles shall be confirmed in lectures and in-person events, as well as completion, reading and discussion of quizzes, handbooks, guidelines, presentations and other content, whether in print or according to the forms to be provided by the Compliance Area.

Employees shall prioritize their participation in training cycles and devote sufficient time to studying the subject matter of such programs. Any absence from training cycles must be justified to the Compliance Area in writing. The repeated and unjustified absence of Employees to the training may imply the imposition of penalties.

13. PENALTIES

Any employee who engages in fraud or corruption, or violates any provision of this guideline shall be subject to disciplinary action, which may include warning, suspension, dismissal for cause or contract termination.

Violation of Applicable Laws may also result in criminal prosecution of the individuals involved, as well as the liability of Concremat Engenharia e Tecnologia by imposing fines, prohibition of receiving allowances, subsidies or loans from public agencies, suspension or partial interdiction activities, damage to its goodwill, among others.

14. REPORTING CHANNEL

Concremat provides a whistleblower channel, operated by an independent company and available 24 hours a day, for reporting activities and behavior that do not comply with the Code of Conduct or any of its internal policies. Concremat, may be accessed through the Compliance Portal, the Concremat website or by hotline 0800 942 0453, ensuring the anonymity of the complainant.

For inquiries and questions regarding Concremat Compliance Program, employees may contact the Compliance area at compliance@concremat.com.br, ensuring full confidentiality about their identity and the treated content.

Concremat encourages its Employees to report any suspected violation of this Code or any of its internal policies, whether by the Company itself, any colleague or even third parties, and identified or anonymous complaints are admitted to the Compliance Area.

All reports received through the report channel shall be properly investigated by the Compliance Area and subsequently submitted for review by the Ethics Committee.

Retaliation against any person who, in good faith, reports unlawful conduct or contrary to the principles and values of Concremat, regardless of the outcome of the investigation into the allegations contained in the complaint, shall not be permitted or tolerated.