

CODE OF CONDUCT



CONCREMAT
engenharia e tecnologia

A company of



中国交建
CHINA COMMUNICATIONS CONSTRUCTION

CODE OF CONDUCT

MESSAGE FROM THE MANAGEMENT

The Code of Conduct of Concremat includes the principles that must be present in the company's relationships with its employees, customers, suppliers, service providers, shareholders, the government and the community.

It is a document that reflects our Basic Values and Policies, a set of guidelines and reference of moral and ethical conduct to guide our actions and decisions.

The Code of Conduct represents our commitment to maintaining a responsible, ethical, transparent and respectful attitude in all of our relationships.

Read, understand, clarify doubts and effectively use this guide as a valuable reference for your day-to-day life.



MAURO VIEGAS NETO
Chief Executive Officer

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1. ABOUT THE CODE

The Code of Conduct (“Code”) represents the commitment of Concremat to a responsible, transparent and respectful attitude in all its relationships and in the performance of its activities.

This Code applies to all the participants in Concremat, whether they be partners, managers, committee members, employees, agents, service providers, suppliers and business partners of Concremat, regardless of their hierarchy and employment role exercised (“Employees”).

2. OUR MISSION

Build a legacy for the future, ensuring quality and efficiency on infrastructure investments.

3. OUR VISION

Be the market leader.

4. OUR VALUES

- We strive to learn and innovate with passion.
- We are prepared to face challenges, supported by teamwork and partnerships.
- We nurture relationship with ethics, trust and care.
- We take responsibility, execute and deliver.

5. COMMITMENTS OF THE EMPLOYEES

All employees must guide their conduct by the principles and values set out in this Code and other policies of Concremat, acting in an ethical and transparent manner, within the bounds of their duties.

Each Employee is responsible for observing, respecting and implementing this Code, as well as the other internal policies and directives of Concremat, and must immediately communicate to the Compliance Department any action or transaction that conflicts with and/or impedes the fulfillment of the guidelines of this Code or of the guidelines contained in the internal policies of Concremat. The Compliance Department will also be available to answer any questions that may arise in relation to the fulfillment of the provisions in this Code.

Specifically, regarding the Directors and Managers of Concremat, they are also responsible for disseminating and ensuring access to and compliance with this Code, developing responsible business practices, aligned with the values of Concremat, and for engaging in frank and transparent dialogue principally in relation to conflicts of interests and ethical attitudes.

6. RESPONSIBILITIES AND RULES OF CONDUCT

6.1. COMPLIANCE WITH THE LEGISLATION

All employees and any third parties that have a relationship or that represent the interests of Concremat, even though temporarily, must act in compliance with the applicable legislation, always seeking to maintain a working environment that respects the dignity of all the Employees and of the interested parties.

6.2. CONFLICT OF INTERESTS

The Employees must act in an ethical manner and in the interest of Concremat, avoiding putting themselves into situations that represent or might suggest a conflict between their own interests and the interests of Concremat.

There will exist a conflict of interests whenever an Employee is not independent in relation to a certain matter and might act with partiality in detriment to the interests of Concremat. The conflicts can occur while performing the daily activities of the Employees, and in trade negotiations. The conflict of interests may also be evident should the Employee make use of resources, goods and assets made available and/or of owned by Concremat for purposes not directly related to the carrying out of his/her activities at Concremat.

If the Employee should identify a situation of conflict of interests, he/she should report it immediately to his/her superior or to the Compliance Department, as is the case, for better assessment and action.

6.3. WORK ENVIRONMENT

Concremat expect the Employees to act with cordiality, respect and dignity in their interpersonal relations inside and outside the work environment, refraining from practicing any type of conduct that may result in creating personal embarrassment to fellow workers, regardless of their job position or gender.

6.4. EQUALITY AND FAIR TREATMENT

Concremat offer equal opportunities to Employees and candidates for vacancies in the company (and they require that the same practice be adopted by their suppliers), including about the conditions for hiring, promotions, transfers, internal and external recruitments, dismissals, wage increases or other form of compensation and recognition of performance.

Any form of discrimination is vehemently repudiated, including that based on race, color, religion, nationality, social class, gender, disability, civil status, age, sexual orientation, identity, weight, height or any other personal characteristic.

6.5. HARASSMENT AND ABUSE OF POWER

Concremat do not tolerate any form of prejudice, discrimination and sexual or moral harassment among the Employees, regardless of their hierarchical levels. This includes, but is not limited to, jokes, insults, name-calling, derogatory comments, threats, unseemly behavior and physical or verbal conduct that may be detrimental to performance, create fear or hostility in the work environment. It is also unacceptable to use the position of leadership to obtain personal favors or services from their hierarchical inferiors.

6.6. USE OF ALCOHOL, DRUGS AND CARRYING WEAPONS

Concremat do not tolerate, under any circumstance, the use of alcohol and drugs and the bearing of weapons by their Employees on the premises of the company and/or in the exercise of their activities. The ingestion of alcoholic beverages and the use of narcotic substances during the period of work, as well as the performance of their duties under the effect of alcohol or drugs, constitute a serious fault and are subject to the application of sanctions by Concremat.

6.7. ASSETS OF THE COMPANY

The assets (vehicles, machinery, computers, telephones and other equipment) and facilities of Concremat are intended exclusively to the conducting of its operations, and it is not permitted to use resources and assets of the company for private purposes or any other purposes. All the Employees and suppliers assigned to the facilities of Concremat must be concerned about the appropriate use and conservation of the company's assets.

6.8. INFORMATION SECURITY

Information is one of the assets of the company. Thus, all the information obtained in the exercise of the activities performed on behalf of Concremat must be maintained under confidentiality and secret by their Employees. Each Employee is responsible for the information of which he/she has knowledge, including for the users and personal passwords provided by Concremat for access to its internal systems.

It is absolutely forbidden for the Employees and suppliers of Concremat to use or pass on to third parties, without previous authorization, any

confidential or exclusive information of the company or of its suppliers and customers, or use privileged and/or relevant information of the company or of the customers with the objective of obtaining personal advantage or in benefit of third parties.

6.8.1. USE OF ELECTRONIC INFORMATION SYSTEMS

The information systems and equipment of Concremat are assets of the organization and, like the others, they must be used only in professional activities of exclusive interest of the company. Each Employee is responsible for using the systems of the company in an adequate manner, in compliance with its internal policies and with the applicable laws. All the communications and information transmitted, received, created or stored in these systems (including on disks, CDs and other storage media) are registers and assets of Concremat.

Although the personal limited use of the system may be tolerated, the sending and receipt of discriminatory messages or of harassment, currents, pedophile material and obscene or any other type of message that violates this Code and/or the applicable legislation is prohibited. Neither is the download and installation of unlicensed software, music and books is permitted.

6.9. INTELLECTUAL PROPERTY

The materials, the designs, the methodologies and the technologies developed by the Employees in the performance of their professional activities are the exclusive property of Concremat. It is not permitted to hold lectures, seminars or academic works about processes and business of Concremat without the authorization of the manager responsible for the matter in question and of the management of the area.

6.10. EXCLUSIVE DEDICATION

The Employees that work full time should dedicate themselves exclusively to their job functions at Concremat, and they are forbidden to render services to any other organization in parallel with and/or in detriment to his/her obligations with the company, except for previously authorized academic activities.

6.11. ACTIVITIES BEYOND THE COMPANY'S SCOPE

Concremat respect the individual right of the Employees to engage in civic affairs and participate, as citizens, in political and religious processes. However, such participation must occur outside of working hours, as long as the Employee makes it clear that his/her political and religious manifestations are personal and not related to Concremat.

6.12. TRADE UNIONS, ASSOCIATIONS AND PROFESSIONAL BODIES

Concremat respect free association, recognize trades union entities as legal representatives of the Employees and seek constant dialogue for the solution of labor or trade union conflicts.

However, the Employees must follow a standard of behavior to avoid anti-competitive conduct in gatherings/meetings involving members of associations, trade unions and professional bodies. Should any discussions be initiated on commercially sensitive topics relating to competing companies and/or suppliers and that might imply restrictions upon the competitive conditions, the Employee present must leave the room and then report the fact to the Compliance Department.

7. RELATIONSHIP WITH SHAREHOLDERS

The relationship of Concremat with its shareholders must be conducted with transparency, providing clear and accurate information that reflects the reality of Concremat and allow them to accompany the activities and the performance of the organization.

8. RELATIONSHIP WITH SUPPLIERS AND BUSINESS PARTNERS

Concremat maintain a transparent and professional relationship with its suppliers and business partners. Business is conducted without the offering or receipt of favors of any kind, such as commissions, advantages, privileges or gifts that it some way might influence the negotiations.

The suppliers and business partners must act with honesty, respect, transparency and cooperation, as well as respect the values, principles and requirements of this Code and of the other internal policies of Concremat. Besides giving priority to the quality of the business and services provided, Concremat expect that its suppliers and business partners invest in continuous improvement and maintain a very close relationship with the company.

9. RELATIONSHIP WITH PUBLIC SERVANTS

Concremat complies with the applicable legislation and encourages development, social well-being and the competitiveness of a fair and free market. Thus, any form of granting advantages/privileges to public servants because of their role is forbidden.

Therefore, it is forbidden for all Employees to:

- Finance, pay for or promote any form of sponsorship of the practice of illicit acts.
- Use anyone to mask or conceal their identity and real interests to practice illicit acts.
- Offer concessions or authorizations, accept or receive any kind of benefit, payment, gift, entertainment or hospitality that might be interpreted as an undue advantage, back-hander, bribe or payment because of the violation of any law, including inappropriate and/or illicit payments to public servants.

In meetings/encounters with one or more public servants, the Employee must be concerned with:

- Involving whenever possible, one or more fellow workers.
- Informing the public servant beforehand about the matter that will be considered and the interest involved.
- Limiting himself/herself to dealing with matters within his/her jurisdiction, respecting the bounds of his/her function.

10. RELATIONSHIP WITH CUSTOMERS

Every trade agreement executed by Concremat must have its terms well defined, to clearly state the responsibilities of each one of the parties. The requirements and the expectations of our customers must always be considered, and all that was agreed to must be strictly met, observing the generally accepted practices, and respecting the applicable legal and technical norms.

Concremat do not discriminate against customers, either due to their origin, economic size or location. However, it reserves the right not to initiate or to terminate any business relation when the relationship represents a legal, economic/financial, geographical, social or environmental risk.

11. RELATIONSHIP WITH CONSORTIUM COMPANIES

The Employees that work in consortia must follow the procedures of compliance established by the leader, provided that there is no violation of the provisions in this Code and in other internal policies and guidelines of Concremat.

12. RELATIONSHIP WITH COMPETITORS

Loyal competition is the basic premise in all the operations of the company, preserving the competitive nature of public and private bidding procedures. Concremat does not tolerate nor collaborate with any forms of corruption, formation of a monopoly and dumping. Thus, the Employees are forbidden to enter into any form of collusion with potential competitors with a view to fixing prices, coordinating bidding procedures or creating market restrictions with the aim of limiting the effects of free competition.

13. COMMUNICATION AND ADVERTISING

Concremat guarantee integrity, honesty and transparency in all communication with the public, including publicity, promotions and sponsorship. The communication and publicity will observe the legislations and the professional codes in force. The transmission of deceptive or abusive information or publicity campaigns that disrespect the social, moral, ethical and environmental values is not tolerated.

Contacts with press agencies must be performed through the company's spokespersons, with the support of the Marketing Management. Unauthorized Employees are forbidden to speak to the press on behalf of Concremat. The Employees must direct the suppliers not to disclose the projects of Concremat without authorization.

When using the channels or discussion areas of Concremat, on the social networks and in situations related to the company, the Employees must observe the values and principles of the company, in order not to compromise its image and reputation. Thus, it is permitted that Concremat be linked to personal posts, such as on Facebook, Instagram and other types of social media, as long as they are not connected with conduct repudiated by the company, do not expose it to risks and do not contain any type of confidential information. It may be that the Employees encounter situations or comments in relation to which they do not know how to proceed. In these cases, it is recommended that they seek direction from the Compliance Department.

14. POLITICAL PARTY CONTRIBUTIONS

It is specifically forbidden to make political contributions on behalf of Concremat. Thus, the Employees may not directly or indirectly use the resources of Concremat, whether through payments or gifts, whether in the form of money or anything else of value, for any party-political purposes.

It is not the intention of Concremat to prevent Employees from participating in the political process of the Country or from making personal political contributions, as long as they are not related in any way to Concremat, and are done in the manner of the pertinent legislation.

15. USE OF SLAVE AND/OR CHILD LABOR, SEXUAL EXPLOITATION AND HUMAN TRAFFICKING

Concremat respect internationally recognized human rights and do not accept, under any circumstance, including from its suppliers, business partners and service providers:

- Direct or indirect involvement with the use of child labor (less than 16 years old), except through special Young Apprentice contracting (considered applicable as from 14 years, pursuant to specific legislation in force);
- Direct or indirect involvement in forced slave labor, or equivalent to slavery, through restriction of freedom, subhuman working conditions, coercion, false promises, geographical isolation, retention of personal documents, obligatory service due to debt, use of force, deceit or action that implies intimidation of any kind;

- Sexual exploitation of children and adolescents; and
- Human trafficking.

It is the duty of all Employees of Concremat to prevent this type of occurrence and, should they become aware of any of the situations listed above they should immediately contact the Compliance Department.

16. SOCIAL RESPONSIBILITY

Concremat act with diligence, ethics and transparency to minimize the impacts that may come to be caused to society, considering civil, political, economic, social, cultural and environmental rights in conducting its business.

The company understands that activities of social responsibility solidify values of citizenship and contribute to the development of skills and the strengthening of team spirit. For this reason, Concremat supports social projects carried out in communities, besides encouraging the practice of volunteer work by its Employees. It also seeks to promote, through its contract managers, a good relationship with the local community, besides benefitting, when possible, the suppliers of the region, the hiring of local labor and support for the institutions in the surrounding area.

17. OCCUPATIONAL HEALTH, SAFETY AND ENVIRONMENT

The principles of Concremat include the assurance of the health and physical integrity of the Employees, third parties, sub-contractors and other personnel involved with the company, besides the preservation of the environment. It is absolutely forbidden for the Employees and any third parties involved with Concremat to practice professional activities, without observing the applicable safety regulations.

Concremat give priority to the responsible use of natural resources and instruct their Employees and business partners to seek sustainable solutions for their activities, having the minimum impact possible on the environment. The Employees must act with commitment and responsibility to prevent and identify potential environmental risks during their activities.

18. FINANCIAL REPORTS AND ACCOUNTS RECORDS

Concremat keeps its accounts records accurate, complete and transparent. Its financial statements, besides being consistent, are always audited and are in accordance with the best accounting practices accepted by the legislation in force.

19. CHANNEL OF COMMUNICATION

Concremat provides a complaints channel, operated by an independent company and available 24 (twenty-four) hours a day, to report any activities or conduct that is not in compliance with this Code or with any of the internal policies of Concremat, which can be accessed through the **Compliance Portal**, Concremat's website or by **telephone 0800 942 0453**, and the complainant's anonymity is assured.

For queries and questions about matters related to the Concremat Compliance Program, employees may contact the Compliance area through **compliance@concremat.com.br**, and they are assured of full confidentiality regarding their identity and the content.

Concremat encourage their Employees to notify all and any suspicion of violation of this Code or of any of its internal policies, either by the company itself, by any fellow worker or even by third parties, and the notifications to the Compliance Department may be identified or anonymous.

There will not be permitted or tolerated any kind of retaliation against the person, who, in good faith, complains of illegal conduct or that contrary to the values and principles adopted by Concremat, regardless of the results of the investigation of the allegations made in the complaint



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