

Sustainability Policy



CONNECTING THE WORLD OF TOMORROW



CONTENTS

Description & Purpose.....	3
Scope & application.....	3
Approval, implementation and training.....	3
Company Commitments.....	3
Environment.....	4
Social.....	4
Governance.....	5
Raising a Concern.....	5
Policy Violation and Disciplinary Action.....	5



DESCRIPTION & PURPOSE

At Constructel Visabeira, S.A. (“Constructel”), we are proud of our heritage and positive for the future. Operating within the prestigious Grupo Visabeira family of companies, we are a successful, family-owned, intergenerational business with a track record of client satisfaction, delivery and positive impact in local communities.

We recognise that our long-term success depends on the health and resilience of our full value chain end-to-end, and that to continue to create financial and social value, the interests of all our stakeholders must be considered. We acknowledge that sustainability, incorporating the concepts of environment, social and governance (ESG), is integral to our business both strategically and operationally.

Constructel is committed to leaving a legacy of positive and lasting impact that enriches lives and uplifts communities. The purpose of the Sustainability policy (the “Policy”) is to outline our approach and commitments to achieving this vision, mitigating our risks and negative impacts, developing our opportunities and positive impacts, and through the publication of the Policy, ensure that all stakeholders have a greater understanding of our shared journey ahead.

Material impacts, risks and opportunities addressed by the policy both in our own operations and those of our value chain are climate change, water, circular economy, labour practices, working conditions and business conduct.

Scope & application

This policy applies to all Constructel companies, their directors, officers, employees, contractors, suppliers and any other third-party involved in the delivery of our products and services in every jurisdiction in which we operate. The Policy applies to all aspects of Constructel's own operations and those of its value chain (upstream and downstream), including all facilities, processes, products and services. Individual operating companies may maintain their own Sustainability or ESG policies which are aligned with this Policy, while also reflecting particular local considerations and priorities.

This Policy is to be read in conjunction with our Code of Ethics and Business Conduct and all compliance-related policies in place and available on our website. [Constructel Visabeira - Corporate Policies](#).

Approval, implementation and training

This Policy was approved by the Board of Directors of Constructel Visabeira, S.A. on July 22, 2024.

Its adoption and enforcement is mandatory for Constructel and its subsidiaries, and its implementation shall be reviewed at the Compliance and Sustainability Governance Committee reporting to the Board of Directors and chaired by the Group Head of Sustainability.

Training on this Policy forms part of the induction for all new starters and will be available online thereafter. The policy will be publicly available on our website.

COMPANY COMMITMENTS

Consistent with the commitment made by our parent company Grupo Visabeira, Constructel states its commitment to upholding the Ten Principles of the UN Global Compact in the areas of human rights,

labour, environment and anti-corruption. These commitments form the foundation of our sustainability practices and may not be offset by good works elsewhere; [Grupo Visabeira, SGPS, S.A. | UN Global Compact](#).

We commit to setting emissions reduction targets in line with the Paris Agreement and what climate science determines is necessary to keep global warming to a 1.5°C pathway through setting science-based targets both in the near-term, and in the long-term, to achieve net-zero no later than 2050; [Target dashboard - Science Based Targets Initiative](#). The process to set these targets and have them validated is in progress.

Environment

We acknowledge that our business operations have impacts on the environment and that we have a duty to protect our planet for generations to come. We commit to:

- complying with all environmental legislation and regulations applicable to Constructel's activities and to the services we provide in every jurisdiction in which we operate;
- regularly assessing the impact of our operations on the environment, continuously seeking to reduce negative impacts;
- measuring, monitoring and reducing greenhouse gas (GHG) emissions resulting from our operations in line with science-based targets (near-term and net-zero);
- using 100% renewable electricity in all of our markets where available;
- working collaboratively with clients, suppliers and all other stakeholders in our value chain to continually reduce negative water impacts, waste, pollution and emissions;
- using all resources prudently, optimising the use of energy, water and raw materials through implementing efficient practices, promoting conservation, enabling regeneration and exploring opportunities for renewable alternatives.

Social

As a business, our *raison d'être* is to enrich lives and uplift communities, to "leave better behind" in local communities and society as a whole through what we do and how we do it. As a service provider, our people are family and the heart and soul of our company.

- We will preserve and promote the protection of human rights and labour rights within our own business activities, as well as those of our value chain, in accordance with our Code of Ethics and Business Conduct and Modern Slavery policies.
- We commit to providing safe and healthy workplaces. We acknowledge the hazards of the work we do and consider the health and safety of our workforce to be of paramount importance. We commit to carrying out prevention planning, identifying and mitigating risks, addressing workplace hazards and complying with relevant occupational health and safety regulations.
- We commit to continually investing in the training of our workforce, promoting the ongoing development of their technical skills and knowledge of environmental and safety standards.
- We commit to fostering a culture of sustainability, encouraging employee involvement in sustainable practices through communicating company commitments and progress and providing opportunities to participate.

- We commit to engaging with all our stakeholders, internally and externally, to promote collaboration and shared responsibility in achieving sustainability goals.
- We commit to preserving the biodiversity and cultural heritage of, and in, the communities in which we operate.

Governance

Doing what is right for our stakeholders is a core tenet of how we operate. Balancing a broad set of stakeholder expectations requires strong governance, high ethical standards and transparency, and is a continuing process of improvement.

- Constructel commits to being a responsible business for all our stakeholders and we will strive to maintain and / or integrate and maintain responsible practices into all aspects of our business operations.
- We commit to high ethical standards through a strong Code of Ethics and Business Conduct.
- We commit to complying with applicable local, national, and international laws, regulations and standards relevant to the industries in which we operate.
- We commit to clear and effective governance for sustainability matters through our Compliance and Sustainability Governance Committee, setting goals, establishing accountability and reporting to the Board of Directors.
- We commit to open communications and transparent disclosures and reporting.
- We commit to performing due diligence in our supply chain, focusing on the most material matters, and working collaboratively with suppliers to set and achieve common sustainability goals.
- We commit to considering sustainability factors when selecting suppliers and partners.

RAISING A CONCERN

Thriving in the long term requires all our stakeholders to play a vital role in building a sustainable organization. This goes beyond just having strong policies. It means integrating sustainability principles into our daily work and fostering a culture of individual ownership. Constructel is committed to a proactive approach, preventing and mitigating potential non-compliance with the policy.

In the case you have a question in relation to this Policy, or a concern about practices in the business being non-compliant with this Policy please contact the Group Head of Sustainability (sustainability@constructel.com) for further guidance.

POLICY VIOLATION AND DISCIPLINARY ACTION

As an employee you have a duty to report misconduct. As a non-employee stakeholder of the Constructel business, we value your commitment to upholding our stated ethical standards and policies.

Any breaches of this Policy, or misconduct (actual or suspected) in relation to this Policy either in Constructel or in its supply chain should be reported as soon as possible in accordance with Constructel's Policy on Reporting Potential Violations ([Constructel - Reporting Potential Violations Policy](#)) and through our whistleblowing channel ([Constructel - Whistleblowing Channel](#)).



Constructel will view any violation of this Policy as a significant matter subject to disciplinary action, up to and including termination of employment and reserving its right to terminate contractual relationships with any agents, representatives, contractors or other third-parties that breach the Policy.

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