

Reporting Potential Violations Policy



CONNECTING THE WORLD OF TOMORROW

CONTENT

1. PURPOSE	3
2. GLOSSARY	3
3. REQUIREMENTS	4
3.1 Whom to report to	5
3.2 How to make a Report	5
3.3 Anonymity	5
3.4 Confidentiality	5
3.5 Protection of Reporting Persons and subjects named in a report	6
3.6 Policy Violation and Disciplinary Action	7
3.7 Review of Issues/Reports	7
3.8 Remedial Measures	7
3.9 Response to Reporting Person	8
3.10 Data Retention and Data Privacy Laws	8
3.11 Local variations to this Policy	8
Questions and support	8

1. PURPOSE

Constructel is committed to maintaining a corporate environment that encourages any officer, director or employee of the Company to report known or suspected violations of law, Constructel's Code of Ethics and Business Conduct, or any other guidelines and policies by any person or entity (within or outside the Company). Individuals who make Reports on Reasonable Grounds will be protected from Retaliation.

If you have concerns, you are encouraged to first raise them with your line manager or another member of management. However, we recognize that this is not always possible and you might instead want to raise a concern under this Policy.

Although there are no restrictions on the concerns that you can raise under this Policy, the types of matters you could report include concerns relating to:

- workplace culture
- financial mismanagement
- breach of rules relating to bribery and corruption
- criminal behavior
- health and safety compliance
- environmental damage
- concealment of, or attempts to conceal, any of the above matters

This Policy is intended to provide a framework for reporting potential violations and appropriate protection for any person who makes a Report on Reasonable Grounds. In addition, this Policy shall provide transparency around the Company's framework for receiving, handling and investigating Reports and for deterring wrongdoing while at the same time ensuring that individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported.

2. GLOSSARY

Integrity Line

The electronic platform is accessible over the following link:
www.constructelvisabeira.com

External Reporting

'External Reporting' means only the oral or written communication of information on perceived misconduct to a competent authority in the country in which you work.

Internal Reporting	<p>'Internal Reporting' means the oral or written communication of information on perceived misconduct within the Company.</p>
Issue	<p>An 'Issue' includes a known or suspected violation of the following:</p> <ul style="list-style-type: none"> ▪ The laws, regulations, or industry codes applicable to the Company in any jurisdiction in which Constructel does business (including in relation to bribery and corruption, health and safety, and environmental damage); ▪ Constructel's Code of Ethics and Business Conduct, guidelines and policies; ▪ Constructel's internal accounting rules or accounting controls; ▪ Constructel's rules or policies relating to workplace culture; ▪ concealment of, or attempts to conceal, any of the above matters.
Personal Workplace-Related Concerns	<p>Generally, this Policy does not cover 'Personal Workplace-Related Concerns'. These are concerns, problems, complaints that employees raise with the Company – directly related to work or the work environment. These reports are protected under applicable laws and practices and a separate process is established in the Company.</p> <p>Though, a personal workplace-related concern may constitute an Issue under this Policy in certain circumstances, as for example when:</p> <ol style="list-style-type: none"> a. It includes information about misconduct, or information about misconduct includes or is accompanied by a personal workplace-related grievance (mixed report); b. The Reporting Person suffers from or is threatened with detriment for making a report - Retaliation.
Reasonable Grounds	<p>Reporting Persons should have 'Reasonable Grounds' to believe, in light of the circumstances and the information available to them at the time of reporting, that the matters reported by them are true.</p>
Report	<p>'Report' or 'to report' means, the oral or written communication of information on an Issue.</p>
Reporting Person	<p>'Reporting Person' is someone who reports an Issue in the context of his or her work-related activities on Reasonable Grounds.</p>
Retaliation	<p>'Retaliation' means any direct or indirect act or omission which occurs in a work-related context, is prompted by Internal or External Reporting, and which causes or may cause unjustified detriment to the Reporting Person.</p>
Subject of a Report	<p>'Subject of a Report' means an individual who is referred to in the Report as a person to whom the perceived misconduct is attributed or with whom that person is associated.</p>

3. REQUIREMENTS

Constructel encourages Reporting Persons to first make an internal Report to one of the following internal recipients in order to help the Company to identify and address wrongdoing as early as possible. However, the Reporting Person may also choose to use External Reporting.

3.1 Whom to report to

A Reporting Person should present an Issue internally to:

- Local Compliance officer;
- the Integrity Line tool

The Reporting Person is also free to lodge an Issue via External Reporting.

3.2 How to make a Report

When making a Report, a Reporting Person shall provide all information on the Issue available to him or her. Reports should provide enough information to allow the Company to investigate the matter properly.

However, a Reporting Person does not need to have conclusive evidence before making a Report; having reasonable concerns about an Issue is sufficient. Although a Reporting Person does not have to prove their allegations, Reports are more likely to be considered reasonable if they can be backed up with some objective supporting information, such as emails, file notes or receipts.

Employees (including Reporting Persons) must not try to investigate any potential wrongdoing themselves (including by gathering evidence through unlawful means, such as covert audio or video recording), because doing so may prejudice any formal investigation under this Policy.

3.3 Anonymity

In countries where permitted by law, a Reporting Person may remain anonymous when making a Report and during any follow-up communication. However, Constructel encourages individuals to identify themselves when reporting an Issue so that Constructel may appropriately review the Report and speak to Reporters to obtain additional information if necessary for the investigation.

The Company will not attempt to identify a Reporting Person who has requested anonymity. However, Constructel may be obliged to report the information regarding the Report and Constructel's investigation of it to public authorities and regulatory bodies.

3.4 Confidentiality

Even if the Reporting Person states his or her name, the Company will make every reasonable effort to protect their confidentiality. If this is not possible, due to government or court order,

for example, the Company will notify the Reporting Person in advance if permitted and unless such information would jeopardize the related investigations. Where a Reporting Person otherwise requests that his or her identity be kept confidential, Constructel will honor that request to the extent reasonable and in accordance with local law and ensure that the identity of the Reporting Person is not disclosed to anyone beyond the authorized staff members competent to receive or follow up on Reports. Further, depending on the nature of the Report and the information provided, the identity of the Reporting Person might be obvious to those involved in an investigation (such as any witnesses or employees who are accused of wrongdoing).

3.5 Protection of Reporting Persons and subjects named in a report

If the Reporting Person has Reasonable Grounds to believe that misconduct has occurred or may occur, or that an improper state of affairs or circumstances exists or may exist in relation to Constructel, or has information indicating that Constructel or any member of its staff has engaged or may engage in misconduct that constitutes an Issue, such information should be reported in accordance with this Policy.

Reporting of Issues on Reasonable Grounds is a key component of Constructel's Compliance program. To encourage Reporting Persons to report Issues without fear, Constructel does not tolerate any form of Retaliation against a Reporting Person. Constructel's employees must not, in any way, threaten or retaliate against any Reporting Person. If a Constructel employee is involved in such conduct, they may be subject to disciplinary action up to and including dismissal. If a Reporting Person believes that they have suffered any such Retaliation, they should report it to the Human Resources function.

Constructel will protect the rights of individuals accused of misconduct where possible and consistent with the Company's legal obligations. Constructel recognizes that some Reports may not be well-founded, and that in those instances, employees can be harmed by unnecessary publication of allegations. If permitted by applicable law and not contrary to Constructel's ability to conduct a fair and complete investigation of a Report, Constructel may notify persons named in a reported Issue about:

- the subject matter of the Reports
- the investigative findings (but investigative reports will not be provided)
- the potential remedial measures under consideration.

3.6 Policy Violation and Disciplinary Action

Where Constructel determines that this Policy and the principles and standards described herein have been violated, it will promptly take appropriate action; such action may include corrective action and/or disciplinary action of Constructel Employees, up to and including termination of employment.

Any employee who knowingly tolerates, encourages or otherwise condones behavior or actions that violate the principles and standards as set forth in this Policy may also be subject to corrective action and/or disciplinary action, up to and including termination of employment.

Anyone raising a concern under this Policy must have Reasonable Grounds for believing the information disclosed was true at the time of making the Report. Knowingly making false allegations under this Policy may result in disciplinary action, up to and including termination of employment.

3.7 Review of Issues/Reports

When an Issue is reported, Constructel will consider the most appropriate next steps, which may include:

- opening an investigation (or asking a third party to undertake an investigation)
- seeking further information from the Reporting Person
- deciding that no further action is required
- referring the Issue to be investigated under another appropriate Constructel policy

In certain cases, Constructel might need to pass on details of any reports to appropriate law enforcement authorities.

As part of any investigation, the investigator may wish to speak to the Reporting Person (as well as other Constructel employees) to obtain more information. If the Issue includes allegations against another person, it is likely that the person will need to be informed about the allegations.

3.8 Remedial Measures

In the course of or at the conclusion of a review, Constructel may determine that corrective and/or disciplinary action is appropriate to address the misconduct or breach of laws. Such action shall be taken in accordance with applicable law, Code of Ethics and Business Conduct and other guidelines and policies.

The Management Board will receive periodic updates regarding Issues investigated and subsequent remedial measures taken under this Policy.

3.9 Response to Reporting Person

The Company will confirm receipt of the Report to the Reporting Person within seven days. Where possible, a Reporting Person will be kept updated with the progress of the investigation and its outcome. In any event, the Company will contact the Reporting Person to give an update within three months of acknowledging receipt of the Report. However, sometimes the need for confidentiality may prevent the Company from giving the Reporting Person specific details of the investigation or any further action taken as a result. A Reporting Person must also keep any information about the investigation confidential.

3.10 Data Retention and Data Privacy Laws

Constructel will retain documentation relating to any assessment or review following any Report directed through this medium, and this Policy, in accordance with applicable data retention policies. Any processing of personal data shall be carried out in accordance with applicable data protection policies.

3.11 Local variations to this Policy

This Policy sets Constructel's common global standards for responding to Issues raised by our staff. Constructel may depart from this Policy to ensure that we comply with our legal obligations in particular locations.

Questions and support

In case any question in relation to this Policy or any other Compliance policy, or in case a specific incident is not covered by any policy, please consult your Compliance Officer (compliance@constructel.com) for further guidance.

It is understandable that Reporting Persons are sometimes worried about Retaliation. Constructel aims to encourage openness and will support staff who raise genuine concerns under this Policy, even if those concerns turn out to be mistaken.

Employees who need support (whether they are considering raising an Issue, or after they have raised an Issue a concern) should contact their local Human Resources representative.

However, although they are able to provide you with personal support, they will not be able to investigate the substance of an Issue. For a concern to be investigated, employees must also raise an Issue in accordance with section 3.1 above.

Annex 1 Key Information on Reporting Potential Violations

1

Reporting Channels – Anonymous reports are accepted (where legally permitted) and followed up on, [and the channels provided enable you to report in writing or in person. You may address your concern to your Compliance Officer or using the Integrity Line available on the company’s website.

2

Hierarchy of Reporting Channels – In the first instance, you are encouraged to use internal channels to raise concerns, which will be kept confidential (where possible) and acknowledged within seven days. You will also receive a further update within three months. You may also report concerns externally to competent authorities.

3

Understand who will be protected - Anyone who could acquire information about a breach in a work-related context. Those afforded protection therefore include (among others): employees, civil servants, the self-employed, volunteers, trainees, non-executive members and shareholders. Protections also apply to those whose work-based relationship has yet to begin, such as those in pre-contractual negotiations, or where it has ended. Third parties that assist those who speak up, such as colleagues or relatives who could be affected by a disclosure, are also protected.

4

Protection measures – The protective safeguards aim to ensure protection from retaliation such as dismissal, suspension, demotion, intimidation or other penalties, such as being denied training or receiving poor evaluations. Protective measures also prevent the reporting person’s identity from being disclosed (without their consent) to anyone beyond authorized staff members who are competent to receive or follow up on reports, or if required by law.

5

What happens with your report – In the current policy we outline how your report will be handled. We also provide information on what might happen if any individual is found to have acted in breach of the rules, and information on how you will be kept updated on developments, in accordance with procedures provided for under national law.