



COMPLIANCE PROGRAM IN MATTERS OF PREVENTION AND FIGHT AGAINST CORRUPTION



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CHAPTER I

Introductory Note

To the regular exercise of its activity, Conduril – Engenharia, SA has promoted in recent years a global policy of “compliance” or good corporate governance, having instituted a Code of Conduct (Ethics and Good Practices) and an Internal Regulation, covering the performance of the company and its affiliates.

As mentioned in its Code of Ethics: «CONDURIL operates in many countries, where there is a wide variety of cultures, laws and political systems. Thus, as a basic standard, CONDURIL must respect the laws of the countries where it operates. It must ensure that it carries out its activities sensitively to the cultural and social traditions of the various communities with which it comes into contact. CONDURIL’s compliance and good corporate governance policy aims to prevent and avoid the violation of rules and/or misconduct that may negatively affect the company or society, contributing to the early identification of problems and risk prevention».

However, Decree-Law 109-E/2021 of December 9 created the National Anti-Corruption Mechanism and established the General Regime for the Prevention of Corruption.

In its turn, Law 93/2021, of December 20, established the General Regime for the Protection of Complainants of Infractions, through the transposition of Directive (EU) 2019/1937 of the European Parliament and of the Council, of October 23, 2019, on the protection of people who report breaches of Union law.

The entities covered by the General Regime for the Prevention of Corruption must adopt and implement a Regulatory Compliance Program and assign a person responsible for such program to ensure and control its implementation.

Due to its size, Conduril – Engenharia, SA is legally covered by the regimes mentioned above. It must establish internal mechanisms to prevent, detect and sanction acts of corruption and related infractions by implementing a Compliance Program in Prevention and Fight Against Corruption.

To this end, in addition to assigning a person responsible for the Program, the company must have a series of instruments, including a Plan for the Prevention of Corruption Risks and Related Infractions. It must be articulated with the other instruments of the Regulatory Compliance Program, namely with the Code of Conduct and Internal Regulations already in force in the company, as well as an internal channel of complaints.

It is intended that this Program contributes to promoting full compliance with applicable legislation and regulations, especially in the context of combating illicit behaviour qualified as corruption or similar, or measures that prevent such behaviour and allow reporting it and holding offenders accountable, following the principles of ethics, rigorous, transparency and responsibility that guide Conduril activity.

Considering the above, Conduril – Engenharia, SA hereby institutes its COMPLIANCE PROGRAM IN MATTERS OF PREVENTION AND FIGHT AGAINST CORRUPTION, hereinafter referred to as the Regulatory Compliance Program or simply the Program.

CHAPTER II

General Arrangements

1. Scope

This Compliance Program refers to Conduril – Engenharia, SA's activity, hereinafter referred to as the company. It covers all the affiliates companies in a group or domain relationship, regardless of whether they are based in Portuguese territory.

2. Structure

The following are structural elements of the Compliance Program:

- a) the rules relating to the Compliance Officer contained in Chapter III;
- b) the Plan for Prevention of Risks of Corruption and Related Infractions (PPR), contained in Chapter IV;
- c) the Internal Complainant Channel in Chapter V;
- d) the Code of Conduct (Ethics and Good Practices);
- e) the Internal Regulation;
- f) the training program(s) on prevention and fight against corruption to be provided within the scope of the company and its affiliates;
- g) other documents, actions or procedures that are adopted, directly or indirectly, by the company to prevent and fight corruption and related infractions or to which the Compliance Program refers, namely the Quality, Environment and Safety Manual.

3. Subsidiary regime

For cases omitted in this Compliance Program, the provisions of applicable law and regulations apply in the same way as in the general regimes for the prevention of corruption and the protection of people who report breaches of Union law.

4. Publication

The Compliance Program will be published and available for consultation on the internet and intranet pages of the company and its affiliates.

CHAPTER III

Compliance Officer

1. Designation

- 1.1. In order to guarantee and control the application of the Compliance Program, the Board of Directors or the Executive Committee of the company will designate the Compliance Officer.
- 1.2. The Compliance Officer may be a member of the company's governing bodies or an employee with the category of director, coordinator, head of department or similar.
- 1.3. For the performance of his duties, the Compliance Officer:
 - a) will act independently, permanently and with decision-making autonomy, and his activity cannot be limited or conditioned, directly or indirectly, by any shareholder, corporate body or employee;
 - b) must have all the internal information and the human and technical resources necessary for the proper performance of his function.

2. Duration, conditions of exercise and termination of functions

- 2.1. The Compliance Officer will serve a three-year term, renewable for equal periods, starting with the notification of his appointment.
- 2.2. The Compliance Officer mandate is not exercised on an exclusive basis, but in addition to the category and functions that he performs

in the company, and his activity will not be subject to additional remuneration.

- 2.3.** Notwithstanding the provisions of the previous number, the Compliance Officer activity's exercise will be considered part of the work period.
- 2.4.** The Compliance Officer will cease to function:
 - a)** at the end of the mandate, if not renewed by the Board of Directors or the company's Executive Committee;
 - b)** before the end of the term, by dismissal, justified in writing, decided by the Board of Directors or the company's Executive Committee;
 - c)** by resignation, at any time, upon prior notice sent in writing to the company's Executive Committee at least 30 days in advance.

3. Competencies

The competencies of the Compliance Officer are:

- a)** to watch over the operation of the Compliance Program and all instruments and regulations of the same Program;
- b)** control the execution of the PPR, and, for this purpose, must prepare:
 - i.** an annual evaluation report, in April of the year following the PPR's execution, containing the quantification of the degree of implementation of the identified preventive and corrective measures, as well as the forecast of their full implementation;
 - ii.** an interim evaluation report, in October of each year, in situations that are identified as a high or maximum risk;
- c)** manage the reporting channel under the terms of the regulation, may be assisted by company employees appointed by him or by the company, by receiving and following up on complaints, without

prejudice to the company being able to determine that the reception can be operated externally;

- d) represent the company, following his duties and by delegation, within the scope of regulatory compliance in terms of preventing and fighting corruption and related infractions;
- e) perform all other activities assigned by law or regulation.

4. Prohibition of retaliation

- 4.1. The company prohibits any acts of retaliation against the Compliance Officer in the exercise of its mandate or after its termination.
- 4.2. An act of retaliation is considered an act or omission, including its threat or attempted act, which, directly or indirectly, occurs in a professional context, causes or may cause the Compliance Officer, in an unjustified way, personal injury and damage to property.

CHAPTER IV

Plan for Prevention of Risks of Corruption and Related Infractions (PPR)

1. Matter and content

- 1.1. The Plan for Prevention of Risks of Corruption and Related Infractions, hereinafter abbreviated as PPR, refers to CONDURIL's organization and activity. It includes administration, management, operational or

support areas and covers the affiliates companies that it controls or is controlled by or are members of the same group.

1.2. The PPR aims to:

- a)** identify, analyse and classify the risks and situations that may expose companies to acts of corruption and related infractions, including those associated with the exercise of duties by holders of the management and management bodies, considering the reality of the industry and the geographic areas in which the company operates;
- b)** establish preventive and corrective measures to reduce the probability of occurrence and the impact of identified risks and situations.

2. Corruption and related infractions

2.1. In general terms, a phenomenon of corruption occurs when someone, directly or indirectly, gives or promises (or tries to give or promise) or then requests or accepts a specific compensation, reward or advantage (personal or equity) to perform an act or omission contrary to the powers and duties of the person who practices them and which results in an unlawful and undue favour (commercial, competitive, contractual, personal or otherwise) of third parties.

2.2. For the purposes of the general regime for the prevention of corruption, corruption and related infractions are understood as the crimes, defined by Portuguese law, of corruption, undue receipt and offer of advantage, embezzlement, economic participation in business, abuse of power, misconduct, lobbying, money laundering or fraud in obtaining or embezzling a subsidy, grant or credit.

3. Responsibility for implementing the PPR

The implementation of the PPR in the company, encompassing its execution, control and review, is the responsibility of the Responsible for Regulatory Compliance appointed by the company, as provided for in the previous Chapter.

4. Sensitive areas of the company's activity

- 4.1.** Company's sensitive areas are understood to be those spheres of activity of the company which, due to the contacts that they establish or may establish with institutions or people outside Conduril, are particularly susceptible to the risk of illicit acts being committed, namely corruption or similar acts to the detriment of the company.
- 4.2.** It is a long-established policy by the company to strictly focus its activity, affecting its human and material resources, on the public works and construction sector and, consequently, not to act directly or indirectly in the scope of real estate development, avoiding the risks of speculation and impairments underlying the fluctuations in this area
- 4.3.** The following will be qualified as sensitive areas of business activity to apply the PPR:
 - a)** any form of publicity, institutional communication and promotional and marketing actions of the company, reported to any sphere of activity of the company;
 - b)** the study, preparation and presentation of projects of any kind or speciality;
 - c)** the study, preparation and presentation of proposals;
 - d)** all acts that directly or indirectly aim at the negotiation and conclusion of:
 - i.** preliminary agreements to set up consortium, both external and internal;
 - ii.** consortium contracts (definitive association agreements), internal and external;

- iii. constitution of joint ventures;
 - iv. subcontracts, namely, subcontracting;
 - v. supply contracts, equipment rental, lease for employees, including authorizations for the use of land, deposit and provision of services, in the context of the execution of works (on-site) and outside of it, namely within the scope of the company's operation at the headquarters and in its delegations;
- e) execution of works in general, covering their provisional and definitive reception, the contractual guarantee period of good execution and the release of the guarantees provided.

5. Risk situations

- 5.1. Given the company's history in terms of preventing and fighting actions and omissions that may constitute situations of corruption and related infractions, and because any of those situations have never been detected, internally or externally, it is considered that there are currently no situations of high or maximum risk, which require more comprehensive and priority prevention measures.
- 5.2. Common risk situations are considered:
- a) firstly, contacts with clients, construction inspection entities, suppliers and other service providers, including subcontractors; such contacts may be with management bodies, staff or external employees of the entities mentioned above in the pre-contractual, contractual, post-contractual or extra-contractual scope;
 - b) secondly, contacts with administrative bodies, namely regulation and supervision, and police and judicial authorities.

6. Probability of occurrence and impact of risk situations

- 6.1.** Also considering the company's history, and there are no records or even internal and external indications of unlawful behaviour qualified as corruption or similar to corruption, it is considered that the probability of such behaviour occurring within the company is low.
- 6.2.** Consequently, it is impossible to precisely define the concrete or foreseeable impacts of such illicit behaviour on the company's activity and the definition of the general and special preventive measures mentioned below, which is why the list of situations is provided in the previous point.
- 6.3.** However, the definition of such impacts, when possible, will be included in the periodic control and evaluation reports that will be prepared by the Responsible for Regulatory Compliance mentioned below.

7. Preventive measures in general

- 7.1.** Without prejudice to the provisions of the Code of Conduct and the Company's Internal Regulation, the members of the governing bodies and Conduril employees:
 - a)** cannot accept or make payments or act in a way that favours personal or other people's interests with customers and suppliers, to the detriment of the company;
 - b)** they cannot make any contributions, monetary or in-kind, on behalf of the company to political parties, associations or movements;
 - c)** must refuse to obtain or provide information by illegal means;
 - d)** they must not, directly or indirectly, make personal offers to third parties and must comply with the company's rules for that purpose;
 - e)** must refuse third-party offers that, directly or indirectly, aim to obtain any advantage;
 - f)** must act to protect and defend the interests of shareholders, create lasting wealth for the company, and also ensure the veracity, adequacy, rigorous, transparency and timeliness of the information

provided to them under the statutory terms and when entrusted by the administration to do so;

- g)** must provide the regulatory and supervisory bodies, as well as judicial and police authorities, with the information requested of them or that appear to be useful or necessary within the scope of their duties and knowledge of facts and documents to which they have access in the same scope, and must not adopt any behaviour that prevents or hinders the performance of the same entities;
- h)** must act to fulfil the commitments assumed by the company towards service providers, suppliers, and demand that they comply with their obligations and observe the good practices and rules of the activity in question, namely regarding the environment, quality and safety, and considering the normal functioning of the market;
- i)** they must promote that the contracts concluded by the company clearly explain the rights and obligations of the parties and respect the applicable legislation and regulations;
- j)** they must choose service providers and suppliers based on objective, impartial and transparent criteria, not granting privileges or favouritism and avoiding, whenever possible, exclusivity regimes. For such a choice, economic and financial indicators, commercial conditions, quality of services and supplies and the ethical behaviour of the provider or supplier in the market and vis-à-vis the company must be considered.

7.2. For the purposes of subparagraphs d) and e), all tips, commissions, gifts, acts of favour (travel, accommodation, meals, etc.) or any payments related to the raising, conclusion and execution of business and the awarding of contracts by the company, irregularly or illegally, or that may also facilitate business for its benefit or that of third parties to the detriment of the company.

8. Preventive measures in particular

8.1. Values of donations and offers

- a)** donations that can be made to third parties by the company's governing bodies: €200.00;
- b)** donations that can be made to third parties by company employees on their behalf: €200.00;
- c)** offers that can be received from third parties by companies' corporate bodies, individually: €200.00;
- d)** offers that can be received by company employees, within the scope of their work and individually: €200.00.

8.2. Recommended number of entities to contact

- a)** recommended number of entities to be consulted to submit prices in studies and proposals: 3;
- b)** recommended number of entities to be contacted to constitute consortium: 3;
- c)** recommended number of entities to be contacted for subcontracting: 3;
- d)** recommended number of entities to be contacted to conclude other subcontracts (supplies, rentals and provision of services): 3;
- e)** recommended number of entities to be contacted to sign contracts for the leasing of personnel on-site, with an offer to do so: 3.

8.3. Rotation and exclusion of contacted entities.

8.3.1. It is recommended to create, whenever possible, a routine or rotation system between the entities contacted to avoid systematic adjudications to the same entity.

8.3.2. The company has already implemented a "blacklist" or "list of excluded suppliers" that, in pre-contractual, contractual and extra-contractual terms, have adopted behaviours contrary to the Compliance Program instruments, specifically the Code of Conduct in force in the company.

- 8.3.3.** The entities included in the list mentioned above cannot be contacted for any contract with Conduril within a minimum period of one year after their inclusion in said list.
- 8.3.4.** In this context, procedures are defined and implemented, including guiding criteria and determining the entities to be contacted. They are included in the Quality, Environment and Safety Manual.
- 8.4.** Writing of sensitive communications
- 8.4.1.** It is a rule that all communications, covering directives, orders, guidelines, and activity plans, of a generic or concrete nature, issued by the administration and by the directors, responsible or coordinators of the sector, or equivalent, with a sensitive nature in the areas considered of risk in the activity of the company, namely concerning the pre-contracting, contracting and execution of contracts, are previously transmitted in writing, even if in summary form.
- 8.4.2.** If the use of written means is not immediately possible, due to the circumstances, and those communications must be previously transmitted orally, they must be ratified by any written means in the shortest possible time.
- 8.4.3.** Communications whose content, by itself or if distorted or corrupted, is liable to degenerate into the practice of illicit acts, namely corruption or similar acts, are considered to have a sensitive character. From the outset, mere instrumental, routine, and expedient acts are excluded from this obligation.
- 8.5.** Exclusivity in the exercise of duties
- 8.5.1.** It is a rule if the respective contracts do not provide otherwise that the exercise of duties in the company under an employment contract, including those in administration, will be conducted on a full-time basis, possibly with exemption from working hours and exclusivity.

- 8.5.2.** Exceptions are made to corporate positions in the company and its affiliate and holding companies and other companies whose corporate purpose is different from those, as long as such exercise is non-exclusive.
- 8.5.3.** The exercise of social positions in associations, foundations and non-profit institutions, and political or similar positions, is also excluded, as long as such exercise is non-exclusive.
- 8.5.4.** The exercise of the aforementioned duties and remunerated duties external to the company and its affiliate and holding companies must, if not known to the company, be communicated to its management and authorized by it.
- 8.5.5.** If a strict duty of exclusivity does not bind them, members of governing bodies and employees must inform the company of the exercise of functions, paid or not, in activities and companies outside Conduril economic group that fall within the same area of activity or that, not fitting in from the outset, may specifically collide with that one. In the event of such exercise and a conflict of interest arising between Conduril and a third party to which the member or employee is related, the latter must expressly and in writing inform the company of such conflict of interest.
- 8.6.** Confidentiality and non-competition
- 8.6.1.** Without prejudice to the provisions of legal and regulatory rules that are specifically directed to them, Conduril members of the governing bodies and employees may not, outside the scope and regular exercise of their functions and powers, disclose any confidential or reserved information to those who have access to the business and affairs of the company, its customers and service providers.
- 8.6.2.** Likewise, they cannot use the positions and functions they occupy to influence Conduril actions or omissions that, directly or indirectly, favour their interests or those of third parties to their detriment.

8.6.3. The exercise of functions external to the company, even when foreseen or authorized, cannot come to configure, directly or indirectly, competitive practice concerning Conduril and the companies in which it participates. For this purpose, competitive practices are considered acts that, either personally or within institutions or companies, fall directly within the same Conduril corporate purpose and areas of activity and its affiliates, which may lead to an economic benefit for them concerning the latter.

8.7. Documentation storage and archive

Without prejudice to specific legal or regulatory obligations or explicit administration decisions, all company documentation must be on a physical or digital file during the minimum periods defined in the Quality, Environment and Safety Manual and current legislation.

8.8. Procedures in sensitive areas

Without prejudice to what is mentioned in other provisions of the PPR, in the departments whose activity integrates sensitive areas of the company's activity, indicated above in point five, even if considered to be of common risk, there are procedures implemented with the activity guidelines of these departments. They regulate the exercise of powers of those responsible and the methodology of control thereof, including delegation, sub-delegation, and ratification. These procedures are mentioned in the Quality, Environment and Safety Manual.

9. General provisions

9.1. Reports

Conduril members of governing bodies or employees who are aware of any behaviour that indicates the practice of acts of corruption and related infractions must report them to the company. Preferably through the internal reporting channel created for that effect.

9.2. Control and evaluation reports

The execution of the PPR is subject to the preparation of the following control reports by the Compliance Officer:

- i.** annual evaluation report, in April of the year following the execution, containing, namely, the quantification of the degree of implementation of the identified preventive and corrective measures, as well as the forecast of their full implementation;
- ii.** suppose the existence of situations of high or maximum risk is found. In that case, an interim evaluation report will be prepared in October of the year of execution of the respective PPR.

9.3. Internal audits

9.3.1. Management may order audits to assess implementation and compliance with the PPR.

9.3.2. Audits will be internal or external, with or without the support of the Compliance Officer, and random or specifically determined, with or without prior notice.

9.3.3. Such audits will report their results and any constraints to management to implement, where appropriate, the necessary corrective or improvement measures.

9.4. Revision

The PPR is reviewed every three years or whenever there is a change in the attributions or in the organic or corporate structure of the company that justifies the review of the risks and preventive and corrective measures provided for in the PPR itself.

CHAPTER V

Internal Reporting Channel

1. Establishment and scope

- 1.1. The company establishes an internal reporting channel, hereinafter referred to as the reporting channel, internal channel, or channel, in compliance with the legal regimes to prevent corruption and protect complainants of infractions.
- 1.2. For all purposes, the reporting channel reports the company's activity. It covers all companies in which it participates in a group relationship or exercises control over the company, regardless of whether they are headquartered in Portuguese territory.

2. Complaints

Under legal terms, complaints concerning:

- a) act or omission contrary to the rules contained in the acts of the European Union referred to in the annex to Directive (EU) 2019/1937 of the European Parliament and the Council, to national rules that implement, transpose or comply with such acts or any other rules contained in legislative acts implementing or transposing them, including those that provide for crimes or administrative offences, referring to the areas of:
 - public procurement;
 - financial services, products and markets and prevention of money laundering and terrorist financing;
 - product safety and compliance;
 - transport security;
 - environmental protection;
 - radiation protection and nuclear safety;

- food safety for human consumption, animal health and animal welfare;
 - public health;
 - consumer defence;
 - protection of privacy and personal data and security of the network and information systems;
- b)** act or omission contrary to and harmful to the financial interests of the European Union referred to in article 325 of the Treaty on the Functioning of the European Union (TFEU), as specified in the applicable European Union measures;
- c)** act or omission contrary to the rules of the internal market in the European Union referred to in paragraph 2 of article 26 of the TFEU, including competition and state aid rules, as well as corporate tax rules;
- d)** violent crime, especially violent and highly organized crime, as well as the crimes provided for in paragraph 1 of article 1 of Law no. 5/2002, of January 11, which establishes measures to combat organized and economic and financial crime;
- e)** act or omission that contradicts the purpose of the rules or norms covered by subparagraphs a) to c);
- f)** all illicit acts that can be qualified as corruption or related infractions, reported in the General Regime for the Prevention of Corruption, such as crimes of corruption, undue receipt and offer of advantage, embezzlement, economic participation in business, abuse of power, malfeasance, lobbying, money laundering or fraud in obtaining or embezzling a subsidy, grant or credit.

3. Complainant

- 3.1.** A complainant is anyone who reports an infringement based on information obtained within the scope of their professional activity and directly or indirectly related to the activity and corporate purpose of the company and its affiliates.

- 3.2.** The following may be considered complainants:
- a)** the company's employees;
 - b)** the company's service providers, contractors, subcontractors, and suppliers, as well as any person acting under their supervision and direction;
 - c)** holders of shareholdings and personnel belonging to administrative or management bodies or fiscal or supervisory bodies of the company, including non-executive members;
 - d)** volunteers and interns, whether paid or not.
- 3.3.** The fact that the complaint of an offense is based on information obtained in a professional relationship that has since ended and during the recruitment process or other negotiation phase of a professional relationship, whether formalized or not, does not preclude the consideration of someone as a complainant.

4. Object and characteristics of the reporting channel

- 4.1.** The reporting channel aims at the safe presentation and follow-up of reports, the confidentiality of the identity or anonymity of the complainants, the confidentiality of the identity of third parties mentioned in the report and preventing access to such reports by unauthorized persons.
- 4.2.** For receiving and following up on complaints, the Responsible for Regulatory Compliance will internally operate the channel, without prejudice to the company determining that the channel is operated externally, only to receive complaints.
- 4.3.** In any case, independence, impartiality, confidentiality, data protection, secrecy and the absence of conflicts of interest in the performance of the functions of the persons indicated in the previous number are always guaranteed.

5. Submission of complaints

Internal complaints are only sent in writing by persons indicated in point three above to the following email address: denuncias@conduril.pt.

6. Follow-up of complaints

- 6.1.** Once a complaint has been received, the Compliance Officer shall transmit it, within three days, to the Company's Executive Officer who, if necessary, will report it to the administrator(s) of the area(s) to which the complaint is reported.
- 6.2.** Within seven days of the complaint, the Company or the Compliance Officer shall notify the complainant of the receipt of the complaint and, if it is understood that the external complaint should take place, inform the complainant, in a clear and accessible manner, of the requirements, competent authorities and form and admissibility of this form of complaint.
- 6.3.** Following the complaint, the company takes the appropriate internal measures to verify the allegations contained therein and, where applicable, to put an end to the violation, including opening an internal investigation or notifying the competent authority to investigate the violation, including institutions, bodies or agencies of the European Union.
- 6.4.** The company or the Compliance Officer informs the complainant of the measures planned or adopted to follow up on the complaint and the respective reasons within a maximum period of three months from the date of receipt of the complaint.
- 6.5.** The complainant may request, at any time, that the result of the analysis conducted on the complaint be communicated to him within 15 days after its conclusion.

7. Confidentiality

- 7.1.** The identity of the complainant and the information that, directly or indirectly, makes it possible to deduce his identity are confidential and are of restricted access to the persons responsible for receiving or following up on the complainants.
- 7.2.** The obligation of confidentiality extends to anyone who has received information about complaints, even if they are not responsible or incompetent for their reception and treatment.
- 7.3.** The identity of the complainant is only disclosed due to legal obligation or court decision.
- 7.4.** Without prejudice to the provisions of other legal provisions, the disclosure of the information is preceded by written communication to the complainant indicating the reasons for the disclosure of the confidential data in question unless the provision of this information jeopardizes the investigations or related legal proceedings.
- 7.5.** Complaints received by the competent authorities that contain information subject to commercial secrecy are treated only to follow up on the complaint, with those who know of it being obliged to secrecy.

8. Processing of personal data

- 8.1.** The processing of personal data in the reception and follow-up of complaints complies with European and national data protection legislation provisions.
- 8.2.** Personal data that are not relevant to the processing of the complaint are not kept and must be immediately deleted.

9. Preservation of complaints

The company will keep a record of the complaints received, which will be kept for a minimum of five years. Independently of that period, during the pendency of judicial or administrative proceedings relating to the complaint, which the company is aware of.

10. Prohibition of retaliation

10.1. The company prohibits the practice of any acts of retaliation against the complainant.

10.2. An act of retaliation is considered to be an act or omission, including its threat or attempted act, which, directly or indirectly, occurring in a professional context and motivated by an internal or external complaint or public disclosure, causes or may cause the complainant to be unjustified, personal or property damage.



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