



# PARTNER / SUPPLIER CODE OF CONDUCT



DECEMBER 2024

“Only by acting sustainably and focusing on our values, can we continue our existence and build a better world!”

Conduril - Engenharia, S.A. has more than 60 years of experience in Civil Engineering Works, meeting the highest quality standards and specifications, seeking the complete satisfaction of each client, promoting trust and loyal relationships with every stakeholder.

## **VISION**

Conduril develops its activity in the field of Civil Engineering and its main goal, in both technical and economic terms, is to become one of the best Portuguese engineering companies (and to be recognised by the market as such), and, at the same time, to possess the following characteristics:

- To be a great company at a national scale, both in technical and economic terms, capable of responding to any civil engineering work both in the domestic market and abroad.
- To be, at a national level, a medium-sized company, flexible and capable of responding to different market demands, and, with great technical ability be able to, above all else, be a solid base of support for its activities abroad.

## **MISSION**

The creation of lasting wealth for our shareholders and the sustainability of the best working conditions and remuneration for our employees, as well as their satisfaction, as the first vector of its social responsibility – whether active or retired, whose support entails Conduril’s continuity, which means the persistent achievement of results.

## **VALUES**

We believe that we can only create value and wealth, that is, be successful in the right way. In other words: with honesty, confidence and accountability based on a culture of Integrity, which means Honesty, Transparency, Justice and a strict adherence to the rules and regulations; these are our values and the foundations of all our principles: Cohesion, Ethics, Culture, Meritocracy, Loyalty, Consistency, Rigour.

## **SCOPE**

This Supplier Code of Conduct applies to all suppliers of the CONDURIL Group, including their subcontractors.

## PRINCIPLES OF ACTION

CONDURIL recognises that the practices and actions of its suppliers can have an impact on its reputation and its ability to achieve the objectives it has established itself. CONDURIL seeks to develop long-term partnerships with suppliers who share these principles and who are equally committed to sustainable development.

CONDURIL aims to create a positive impact throughout the value chain, establishing criteria to encourage its suppliers to adopt socially just and environmentally responsible practices, contributing to the well-being of the communities in which it operates and to the preservation of natural resources.

The Supplier Code of Conduct aims to ensure transparency in the relationship with suppliers, incorporating the principles established in the Sustainable Procurement Policy.

The CONDURIL Group's supplier selection process is guided by criteria of objectivity, transparency and non-discrimination: the selection criteria – ethical, technical and economic – are defined as clear, impartial and transparent, avoiding, whenever possible, situations of exclusivity.

The procedures in force allow the management, evaluation, classification and monitoring of supplier performance, promoting compliance with standards and good practices, particularly in terms of quality, environment, health and safety and information security and others resulting from current legislation.

Conduril does not condone coercive commercial practices or any type of harassment or violence, assuming fair and just competition in its activities.

Suppliers must ensure, at a minimum, legal compliance and observe the principles listed below, ensuring compliance with them throughout their supply chain.

### 1. Compliance with laws and regulations

Comply with current national and international legislation that is applicable within the scope of the contractual relationship with CONDURIL, namely laws, regulations, standards and operational, technical and sectoral procedures in any geography in which it operates.

Suppliers must ensure full compliance with laws, rules, regulations and licenses applicable to trade and export relations.

CONDURIL will not establish commercial relations, directly or indirectly, with any supplier that violates any provision contained in said laws and we expect our suppliers to adopt similar behaviours.

### 2. Human Rights

CONDURIL respects the Human Rights set out in the Universal Declaration of Human Rights and current legislation, not tolerating discrimination of any nature due to race, ethnicity, social class, nationality, religion, sex, sexual orientation, party affiliation, age, family responsibility, marital status, trade union membership or disability. Conduril suppliers are expected to not only comply with these standards, but to actively promote an equitable and inclusive work environment.

### **3. Decent work**

Suppliers must ensure fair working conditions, ensuring working hours, breaks and holiday entitlements in compliance with applicable legislation. They must also promote a safe working environment and protection against any form of abuse, harassment or discrimination.

Suppliers must unequivocally repudiate the use of any form of child labour, forced labour or any activity carried out under coercion, intimidation or threat of punishment or retaliation.

Suppliers must not, under any circumstances, engage in practices that promote, tolerate or permit any form of harassment, physical or moral, or sexual abuse in the workplace.

### **4. Fight against corruption and bribery, prevention of money laundering and terrorism financing**

CONDURIL operates in many countries, where there is a wide variety of cultures, laws and political systems. Therefore, as a principle, CONDURIL acts in strict compliance with the laws of the countries in which it operates, ensuring that it carries out its activities in a way that is sensitive to the cultural and social traditions of the various communities with which it comes into contact.

The prevention and combating of corruption and related offences aims to prevent and avoid the violation of rules and/or misconduct that may have negative consequences for the company or society, contributing to the early identification of problems and risk prevention. It thus constitutes a defence mechanism for the company against undesirable involvement, including money laundering and terrorist financing.

Suppliers must adopt and promote behaviours guided by imperatives of ethics, rigor, transparency and responsibility, namely by scrupulous compliance with both the legislation in force in the countries in which they operate and CONDURIL's internal rules and regulations.

Suppliers must refrain from carrying out any act that may constitute a violation of anti-corruption, bribery and money laundering prevention rules, and must also adopt reasonable measures to prevent such acts, ensuring at least legal compliance.

### **5. Fair competition**

Suppliers must comply with legal and regulatory provisions regarding free competition, ensuring that their commercial agreements do not contain restrictions on the same, namely, but not limited to price fixing, false bids, market division, etc. Suppliers must refrain from any illegal or unethical practices, always adopting fair business conduct.

### **6. Environmental and climate responsibility**

Suppliers must adopt processes, methods, practices, materials and products that promote efficient management of resources, with the aim of reducing greenhouse gas (GHG) emissions and the consumption of energy, raw materials and water.

Suppliers must promote the circular economy, encouraging the reuse and recycling of materials, prioritizing the use of renewable energy sources and adopting practices that contribute to carbon neutrality.

## **7. Health and safety**

Suppliers must promote the improvement of health and safety conditions in the performance of the activities carried out, applying general safety principles, through the adoption of measures that allow the elimination of danger, assessment and control of risks, preventing injuries and health problems among employees, enhancing their motivation, personal and professional achievement and team spirit.

## **8. Data protection and information security**

Suppliers must adopt data protection and information security measures ensuring the confidentiality, integrity and availability of information received and processed within the scope of the commercial relationship and after its termination, respecting the provisions of applicable legislation and contracts entered into.

## **9. Transparency and integrity**

Suppliers undertake to provide, whenever requested, relevant information and documentation related to the aforementioned principles, maintaining integrity and promoting a relationship of mutual trust.

## **OUR COMMITMENT**

CONDURIL undertakes to only establish or maintain commercial relations, throughout its value chain, with suppliers who are committed to the principles established in the CONDURIL Supplier Code of Conduct, adopting the measures considered appropriate in cases of non-compliance with this code by its suppliers.