



# GROUP

## CODE OF ETHICS AND CONDUCT

First Issue

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# CODE OF ETHICS AND CONDUCT

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## CODE OF ETHICS AND CONDUCT

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### 1 MESSAGE FROM THE EXECUTIVE COMMITTEE

The Group was born 27 years ago. Its ambition was simple but bold: a Client-centric company that was flexible, fast and capable of developing High-Quality Projects. To do it well and quickly, always upholding Quality and Good Principles.

27 years later, this formula, which seemed impossible, is the brand image of the Group. 25 years in which the GROUP always remained faithful to its values:

- **High Standards and Determination**
- **Excellence**
- **Integrity**
- **Respect**
- **Collaboration**
- **Flexibility**

We remain committed to growing even more. Not as an end in itself but with the aim of providing our Staff, Clients, Partners and Suppliers with even more opportunities, to overcome challenges, to create more wealth and to contribute to the Societies in which we operate in a positive way.

However, an organisation can only grow in a sustainable way and create bonds of trust, when it possesses a strong culture and principles of ethical conduct that are not only known but also followed by all those who are part of it. Far more than complying with rules and regulations, we must act in accordance with our own ethical principles. That is what leads us to think and act in the right way, thus upholding the unquestionable ethical standards for which our GROUP is known.

Sometimes, a tiny stone can make a huge gear mechanism grind to a halt. The same is true of an organisation – a small misconduct can jeopardise its reputation or even the entire organization itself, putting all Employees at risk.

The Integrity of the GROUP is fully dependent on the individual behaviour of each of its stakeholders, regardless of day-to-day or corporate pressures. Because Ethics and (good) Conduct are anchors to cope with such pressures, we have decided to publish this Code, which is nothing more than a set of common-sense phrases and messages that have always been intrinsic to the Group.

The good performance of the GROUP is based on trust. The trust that binds Clients, the Company, its Employees, Suppliers and Public Institutions acts like the concrete of our organisation. Without that concrete, no organisation can stand.

GROUP is confident that everyone has assimilated its Values and Principles and defends them every day, keeping in mind this Code of Ethics and Conduct.

## 2 PRESENTATION

### 2.1 Scope and Goal

The GROUP operates internationally as an Engineering and Architecture Consultant. Although we act in diversified business areas and in different geographies, our attitudes should be the same, which is why this Code defines how the Group's companies, employees and business partners (when the GROUP can be held responsible for their actions) should act, both among themselves and in relation to the communities in which they operate.

All Employees must act in an upright and efficient way in the search of value creation for Clients and for the Group, by incorporating the values set out in this Code.

The Code was created for the following purposes:

- To clarify and disseminate the Principles and Values that guide the activities of the GROUP Group, so that all employees can understand them, assimilate them and put them into practice;
- To promote and encourage the adoption of exemplary attitudes and behaviours towards all Employees, Suppliers and Business Partners;
- To consolidate the institutional image of the GROUP as an ethical and responsible organisation.

***The Code of Ethics and Conduct is a guide and does not restrain me***

*The Code helps me on my day-to-day activities and inspires me, it does not restrict me. It gives me a line to follow in my behaviour, but it does not curtail my actions.*

*By understanding this Code, I act with greater autonomy and within the ethical standards in which I believe, and which are expected of me by the Institution.*

### 2.2 Intended Recipients

The Code applies to all members of the Group's corporate bodies (hereinafter referred to as "Employees") and to any person or entity providing services to the GROUP (suppliers and business partners) on an ongoing or sporadic basis.

### 2.3 Dissemination and Compliance

This Code is provided to all Employees, Suppliers and Business Partners and is published in the Group's website: [WWW.QUADRANTEGLOBAL.COM](http://WWW.QUADRANTEGLOBAL.COM)

All Employees undertake to comply with this Code upon receiving it. To this aim, they understand that they are to read it carefully and refer to it whenever necessary. At the time of signing of their employment contract, all new Employees also sign a Declaration certifying their awareness of this Code and their individual commitment to comply therewith.

Business Partners shall also sign a commitment to comply with the rules and principles set out in this Code prior to the commencement of their performance.

The GROUP undertakes to disclose this Code to all its suppliers, who shall, whenever the GROUP can be held responsible for their actions, act in accordance with the rules and Principles described herein.

### 3 QUADRANTE's CULTURE

#### 3.1 Mission

##### **Designing. Delivering. Adding Value**

The company's mission reflects the purpose of its existence.

QUADRANTE's mission involves creating value through Engineering and Architecture Consulting Services

There are several aspects of adding value – adding value for Clients by providing services with prices below the perceived value; adding value for employees through the possibility of career development, allowing them to gain higher levels of experience; and adding value for the company, through its own operating efficiency, thus giving rise to results that allow providing excellence in Customer Services.

#### 3.2 Vision

QUADRANTE seeks to serve its Clients in an exceptional manner, creating value through professional and diligent actions, abiding by the strictest ethical principles. It aims to strengthen its ability to attract and retain exceptional employees, providing unique opportunities for development and responsibility. To do so, it evolves as a global provider of Engineering and Architecture services that aims at becoming a benchmark company.

#### 3.3 Our Values:

##### **High Standards and Determination**

We are strongly committed to our clients and therefore we try to exceed their expectations in every project. We anticipate Client's needs and respond to each problem with resilience and determination. Driven by the will to find more and better technical solutions, we work hard to achieve professional and commercial success.

##### **Excellence**

We encourage excellent service, we stimulate the excellence of our employees and we constantly strive to develop innovative, efficient and sustainable solutions capable of generating value for our clients. We are proud of our history, the path we have followed and the work we do every day.

##### **Integrity**

We know that integrity is vital to the fulfilment of all the commitments that we assume. We are guided by a fair and rigorous behaviour that promotes a culture of safety and general well-being.

Honesty defines what we are and what we do, thus we demand a strong sense of ethics from the whole team and do not tolerate any form of bribery or corruption.

##### **Respect**

We are constantly concerned about respecting the environment and the communities impacted by our work. Client satisfaction is paramount, and we see its interests as our own. As we have a global and multidisciplinary presence, we know the importance of valuing all human beings and all cultures, this is why we invest in operations characterised by the principle of equality.

## **Collaboration**

We believe that success results from teamwork and therefore we invest in the professional relationships we establish with our clients. We guide what we do by a sense of collaboration and devalue individualism. We care about the communities impacted by our work, fostering a sense of cooperation at all levels.

## **Flexibility**

We are a team of flexible and versatile professionals. We adapt to the local contexts in which we work and deal with change in a straightforward manner. We collaborate with our clients with a focus in continuous improvement, seeking maximum efficiency in all that we do and in the solutions we develop.

### 3.4 How to BE QUADRANTE

#### **1 - Professionalism**

Our team is composed of highly qualified professionals with recognised experience in other high-standard organisations. A team that works according to the best standards and practices in the industry. A team that faces each challenge with responsibility, rigour and competence, investing in the best management, engineering and compliance practices to provide high-value services to the client.

#### **2 – Sustainability**

We assume the responsibility and the opportunity to contribute to the improvement of environmental, social and economic sustainability, developing policies that allow us to assure that sustainability is a pillar of QUADRANTE's culture.

We work closely with our clients to ensure the development of highly sustainable solutions adjusted to the cultural, physical and social reality of each project, aiming for lower impacts and lower energy and material consumption during the construction and life cycle of the infrastructure we design.

We believe in leading by example and we are proud of contributing to improve the quality of life of the communities in which the infrastructures we design are delivered.

#### **3 – Commitment**

Each QUADRANTE consultant has a commitment towards the organisation and the organisation has a commitment towards the client. This describes what we are and what we do. We are continually committed on understanding each Client's needs and demands, trying to challenge them with innovative solutions, exceed their expectations and promote sustainability in the environment where we operate.

#### **4 - Collaboration**

We know that great accomplishments cannot be achieved in an individualistic way and that teamwork is vital to success.

"If you want to go fast, go alone. If you want to go far, go together." This is one of the mottos that govern us. Therefore, we advocate for projects developed by multidisciplinary teams that contribute with different points of view for the richness of the solution. We believe that our services shall be developed in close collaboration with the client, which we see as an integral part of our team.

## **5 – Resilience**

We know that the best solutions are not easy to find. We know that simplicity is not easiness. We know that, in order to face the volatile and unforeseen environment that surrounds our clients and our organisation, our activity needs to be driven by persistence, operational capacity, ambition, and flexibility, to assertively respond to short- and long-term objectives.

That's why we are resilient, in other words, flexible and resistant.

## **6 – Integrity**

Over the last 25 years, we have evolved from a small company of four Engineers to a multidisciplinary company present in ten countries located on three different Continents.

Since day one, our convictions have been absolutely clear – bribery, corruption and lack of ethics are completely unacceptable. A philosophy that is always present in the way we conduct our business and in the dedication we put into each project.

A philosophy that is part of the organisation's deepest values

## **7 – Creativity**

Creativity and feasibility go hand in hand at QUADRANTE. Working as a team, we look for creative and innovative solutions to face the challenges and constraints that are presented to us.

We are continually learning to be more creative. We learn through the experiences of the organisation around the world. We always want more, and we always aim to be better. Therefore, we look for demanding clients who foster our creativity, placing at their disposal multidisciplinary and highly motivated teams that are able to meet their challenges.

## **8 – Human Focus**

The Infrastructure and Buildings we design are intended to improve human life. We know that our activity forces us to have a high sense of responsibility towards Society.

We are talking about the improved conditions that a hospital promotes, the impact that a water supply and sewage system have on the increase of the average life expectancy or the improvement that an electric power system brings to the population. We are talking about the impact that a new road network has on reducing the traffic time of thousands of people, and also about the improvement that an infrastructure well integrated into the environment can promote. These are some examples of our contribution and of what we do and what we can do for the welfare of the Human Being.

## **9 – Safety**

The concern for the safety of our Employees, of the Workers involved in the construction of our projects and of the populations we serve is constantly present in our activity.

We seek to actively contribute to a zero-accident policy throughout the life cycle of the infrastructure we design by using solutions and issuing recommendations for all stakeholders that focus in human safety.

## **10 – Risk Management**

We know that risk management is absolutely vital for our clients. This is the reason why we seek to help them to identify risks, but also to find measures to contain and mitigate them.

We are aware that risk involves two sides: danger and opportunity. Therefore, we guide our clients in risk management considering the opportunities that each risk may offer, trying to maximise their gain.

## **11 – Leadership**

Clients can expect proactivity and leadership from QUADRANTE. We do not react to challenges and constraints with indifference; we confront them with solutions.

We avoid inaction while taking leadership of any matter, responding in a diligent, dynamic and efficient way.

### **3.5 Our Principles**

- 1 – We operate in an ethically flawless and independent way
- 2 – We seek to approach our work from the client's point of view and with a "spirit of ownership"
- 3 – Our work is guided by rigour, quality, analytical skills and flexibility
- 4 – We encourage career development and support the training of our employees
- 5 – We advocate for economic and social development and for a sustainable environment



## 4 OUR PEOPLE

### 4.1 Commitment to Our Employees

The GROUP takes on the following commitments towards its Employees:

- to act in accordance with all applicable legal and regulatory standards and, in particular, with the rules governing the protection of workers' rights;
- to protect all employees and not tolerate any acts of psychological violence or moral coercion
- this includes insults, threats, ostracising, invasion of privacy or professional limitation – with the purpose or effect of embarrassing the person, impairing their dignity or creating an intimidating, hostile, degrading, humiliating or destabilising work environment;
- to never condone any form of harassment or violation of the dignity of employees;
- to not admit discriminatory behaviour towards Employees on the basis of gender, race, ethnicity, religious conviction, partisan affiliation or otherwise, so as to promote equality of opportunities and ensure integrity and dignity in the workplace;
- to promote personal development and professional progression of our Employees, through ongoing training and selection, evaluation and remuneration policies that are guided by the criteria of merit and best market practices;
- to provide a healthy, safe and enjoyable working environment, which encourages well-being and productivity;
- to promote communication and information sharing among Employees;
- to conduct the Group's business based on a vision of long-term Value Creation, allowing Employees to take part in the construction of the GROUP and promoting common goals and team spirit.

### 4.2 Commitments taken on by Our Employees

The Group's employees take on the following commitments:

- to carry out their duties in a responsible and professional manner, protecting the Group's resources through rational, sensible and frugal use;
- to adopt an appropriate and dignified behaviour, which is consistent with the prestige of the GROUP, namely when communicating with other Employees or with third parties;
- to use social media and online communication responsibly, so as to prevent such use from damaging the good name of the Group, and to refer to it always with respect, loyalty, common sense and in line with the Group's Values and Principles;
- to update their knowledge and skills, ensuring they are in line with their professional goals, attending any training opportunities offered or recommended by the Group;

- to adopt a collective and individual attitude that is committed and proactive both in terms of teamwork and individual initiative, at all times, in order to increase productivity and efficiency;
- to contribute to the Group's business in a consistent, creative, committed and persistent manner, so as to help the GROUP achieve its goals and results, properly managing risks;
- to refrain from using any Confidential Information for their benefit or disclose any Confidential Information to anyone outside the GROUP, also undertaking to take all necessary measures to ensure that such information remains confidential;
- to not have any direct or indirect interest in any Concurrent Entity (whether as an administrator, manager, director, partner, shareholder, owner, employee, consultant, agent, representative, supplier or stakeholder of any kind) or in any entity that sells or purchases goods or services from the GROUP, unless duly authorised by their hierarchical superior;
- to refrain from carrying out any activity that competes against the interests of the GROUP;
- to refrain from accepting any commissions, prizes or gratuities from any third parties with whom QUADRANTE has commercial, professional or partnership relations, in accordance with section 9.4 of this Code;
- to ensure that any GROUP assets (including mobile devices, computers and e-mail addresses) in their possession are used only for professional purposes and to refrain from using them for any other purposes – see also section 9.1 of this Code;
- to safeguard the GROUP's commercial relations with its Clients, in particular, refraining from using them for personal benefit or transmitting to any third parties – even after leaving the GROUP – any contacts or activities in which they have been involved with GROUP Clients, except in the context of curricular references.

## **Individual Responsibility**

*It is my responsibility to know and fulfil my obligations towards the company and towards my coworkers, who do the best they can every day.*

*By knowing clearly how I should act, I will act with greater autonomy and I can grow professionally, thus strengthening QUADRANTE's Culture.*

*I am proud to be part of an organisation that values integrity and that wants to do well and abide by good principles, even knowing it is not perfect.*

### 4.3 Interpersonal Relations

The Employees of the GROUP undertake:

- to behave in a cordial manner, taking into account the due mutual respect between persons
- to assume, with each other and with Suppliers and Business Partners a transparent, clear and honest behaviour, communicating as clearly as possible
- to assume an attitude of open and loyal cooperation that contributes to a good work environment and greater productivity, with the aim of, in a joint effort with Clients, striving for excellence

### 4.4 Personal Relations in the Workplace

The GROUP recognises that, in the context of professional life, personal or affective relationships may naturally develop between Employees. While the Company does not prohibit such

relationships, it is essential that they are conducted responsibly and transparently, always safeguarding professionalism, integrity, and the Group's best interests.

## **1. Respect for Privacy**

The GROUP respects the private lives of its Employees. Personal or affective relationships are permitted, provided they are consensual, respectful, and do not interfere with the performance of professional duties.

## **2. Professionalism**

All Employees are expected to maintain a professional attitude in the workplace at all times. Behaviour that could be considered inappropriate, disruptive, or harmful to the work environment will not be tolerated.

## **3. Management of Conflicts of Interest**

3.1 Where a relationship involves, namely, the direct hierarchy or influence over decisions regarding evaluation, promotion, remuneration, or disciplinary matters, it must be reported immediately to the Human Resources Department.

3.2 The Human Resources Department evaluates and determines the susceptibility of the personal or affective relationship to compromise (or not) the organizational integrity of the Company and/or any other Society of the Group.

3.3 If there is a potential or effective conflict of interests, the Company is entitled to adopt the measures that are considered proper to prevent and/or to address that conflict, namely the temporary assignment, of the employees involved, to other roles; the adjustment or temporarily suspension of the reporting lines; blocking the participation on procedures regarding appraisal promotion or salary definition; annulation or suspension of decisions, among others, always aiming to prevent or to address any situations of conflict of interests, favouritism, or any other type of conflicts which result from the personal or affective relationship that may impact directly the organizational integrity.

3.4 Any disrespect of the content displayed on 3.1 is susceptible of being considered as a disciplinary infraction of the terms settled on applicable Labour Law.

## **4. Confidentiality and Discretion**

Any information shared in the context of a personal relationship will be treated with confidentiality. The GROUP will only intervene when necessary to safeguard business integrity, equality of treatment, or to prevent harm to the organisation.

## **5. Respect After the Relationship**

If a relationship comes to an end, both parties are expected to continue to act with professionalism and mutual respect. Any form of harassment, retaliation, or behaviour that negatively impacts the work environment is strictly prohibited.:

## 5 CLIENTS

In addition to ensuring the quality of the services provided and compliance with legislation, the GROUP is committed to serving its Customers with efficiency, speed, politeness, transparency, loyalty and flexibility.

The Employees of the GROUP must:

- pursue maximum Client satisfaction, without infringing upon any of the rules, Principles and Values that must guide their activity;
- provide Clients with all the information necessary for their decision-making and to ensure strict compliance with the commercial conditions agreed upon;
- inform Clients about any risks associated with their decisions and possible mitigation measures

## 6 SUPPLIERS AND BUSINESS PARTNERS

### 6.1 Commitments to Suppliers and Business Partners

The GROUP takes on the following commitments with its suppliers and business partners:

- to select them based on clear and unbiased criteria, but looking for lasting and recurrent relationships;
- to be clear and systematic in evaluating the performance of Suppliers and Business Partners and give them feedback about it in order to allow for the continuous improvement of the business relationship;
- to ensure a clear and fluid relationship, especially with regard to communication and cooperation, in order to ensure high productivity and efficiency both for the GROUP and for the Supplier/Business Partner;
- to respect the confidentiality of all information received from suppliers and partners;
- to encourage suppliers and business partners to adopt environmental and social best practices and ensure compliance with the standards established in this Code;
- to refrain from hiring employees who formerly worked for any suppliers or business partners without a prior agreement.

### 6.2 Commitments by Suppliers and Business Partners

Suppliers and Business Partners must commit to the following:

- to adopt an appropriate and dignified behaviour, which is consistent with the prestige of the GROUP, namely when communicating with any third parties;
- to refrain from using any Confidential Information received from any Employee of the GROUP for their benefit or disclose any Confidential Information to any third parties, also undertaking to take all necessary measures to ensure that such information remains confidential;
- to ensure that any GROUP assets are used only for the professional purposes agreed upon, while protecting them and using them in a rational and sensible manner;
- to safeguard the GROUP's commercial relations with its Clients, in particular, refraining from using for personal benefit or transmitting to any third parties any contacts or activities in which they have been involved with GROUP Clients, except in the context of curricular references;
- to refrain from directly soliciting Clients with whom it was involved while working with the GROUP to, in any way, originate or have as a direct consequence a direct commercial relationship with them, except if such Clients are already proven to be Clients of the Supplier or Business Partner; and forthwith inform the GROUP in case it receives any solicitation from Clients of the GROUP to this aim
- to ensure a clear and fluid relationship with the GROUP, especially with regard to communication and cooperation, in order to ensure high productivity and efficiency;
- To refrain from hiring employees formerly working for the GROUP without prior agreement

## **7 COMPETITORS**

The GROUP respects its competitors and seeks to overcome them in a healthy way, by being more competitive at offering superior quality services. Our relationship with competitors obeys the rules of cordiality and mutual respect and does not condone any attitudes that are tantamount to slander or defamation against any competitors.

## 8 COMMUNITY AND ENVIRONMENT

***A company of engineering and architecture consultants focused on designing the best solutions.***

We are fully aware of the importance of the Infrastructures and Buildings we design, both for our Clients and for society. We understand their impact on the natural and social environment and believe that their preservation is crucial. We know that the essence of our business is to focus on solutions and that is why we work in multidisciplinary teams, based on the experience and innovative capacity of our professionals.

The GROUP seeks to adopt the best environmental practices, and design Infrastructures that promote the most rational use of resources and maximum efficiency.

## 9 BUSINESS CONDUCT

### 9.1 Use of the Group's Resources

The assets of the GROUP are exclusively meant for professional use and are not to be used by Employees, Suppliers or Business Partners for their own benefit or for that of any third parties.

Each employee is responsible for correctly using the property and assets of the GROUP entrusted to them within the scope of their duties, promoting a rational and efficient use and avoiding waste, which has a negative effect on the Group's profitability and sustainability.

The aforementioned goods and assets include, but are not limited to, mobile devices (e.g. mobile phones, tablets), utensils, accessories, computers, printers, fax machines and other computer equipment, hard copies or digital copies of data documents, drawings, designs, templates, vendor or client lists, spreadsheets or other programs provided by the GROUP, as well as Works Carried out.

The Employees undertake to safeguard the assets mentioned above and to refrain from copying or removing (electronically or otherwise) such property outside the premises of the GROUP, except for professional reasons and only with the consent, even if tacit, of the hierarchy.

At the time of termination of the employment contract, and regardless of the fact that caused it, Employees must return to the GROUP any assets belonging to the company and shall keep no copies thereof, on any media.

The innovations or inventions developed by the Employees in the course of their work and any property rights related thereto shall be incorporated into the assets of the GROUP and shall belong to it even after the Employee in question leaves the Group.

The use of the GROUP's personal communication means and equipment (telephone, internet and others) is to be restricted to professional use. The Internet may not be used for sending or receiving any information that is offensive, aggressive or that offends common decency. The GROUP, except in case of any mandatory legal limits, and insofar as necessary in terms of Security or to ensure the continuity of the service, may freely access any records and computer or electronic data in equipment made available to Employees, including electronic correspondence sent or received using the electronic address provided.

#### ***Various relationships, one single conduct***

*In my daily life, I talk to several people, I play several roles, I interact with different organisations and I carry out many functions.*

*The QUADRANTE Code of Ethics and Conduct inspires me and guides my conduct so that I can act consistently in all these relationships, be it with clients, partners, suppliers or co-workers, in conversations, social media, meetings, etc.*

*I am a unique person and, therefore, I follow a single line of conduct, which is aligned and ruled by QUADRANTE's culture and conduct guidelines, regardless of the interlocutor or means.*

*This is how I build trust, credibility and respect towards everyone around me.*



## 9.2 Use of the Group's Information

The GROUP recognises the Right to Information on matters of public interest, even when it concerns private companies.

However, the Group and its Employees are committed to ensuring the confidentiality, privacy and integrity of any Information to which they have access within the scope of their activity.

All Employees, as well as the Group, shall maintain the confidentiality of any and all confidential facts and information, respecting the rules established in this regard.

None of the GROUP's internal information is to be disclosed or shared with any third parties, including Client names, works completed or in progress or any internal documentation belonging to the GROUP without prior authorisation from the competent body.

The GROUP has an exclusive channel for disseminating information to the outside. Such information is authorised and approved before being disclosed in compliance with the Group's Confidentiality commitments.

The GROUP collects personal data relating to the employment relationship with Employees and Candidates, ensuring that their treatment complies with the requirements of the General Data Protection Regulation (GDPR).

## 9.3 Conflicts of Interest

A Conflict of Interest arises when personal or third party interests interfere with the interests of the Group.

All Employees undertake to:

- take on a loyal behaviour towards the GROUP, avoiding any situation or activity that could lead to a conflict of interests or impair their professional performance (such as competing parallel activities or professional interactions with any third parties with whom there is a relationship of close kinship or friendship);
- refrain from exercising any function or negotiate, on their own behalf or on behalf of others, in competition with the companies of the GROUP;
- refrain from intervening in decision-making processes that may result in a potential conflict of interest, especially in cases directly or indirectly involving any organisations in which they have collaborated in the past or involving relations of close kinship or friendship, and, in the impossibility of refraining from intervening in such processes, request prior authorisation to do so from the Executive Committee.

#### 9.4 Gifts

Employees must refuse any benefits or gifts offered to them by any Clients, Suppliers, Partners or any other entities with the purpose of influencing or rewarding the contracting of GROUP services over an individual amount of 200 euros.

However, should it not be feasible to refuse or return them, such assets must be handed over to the Group, and the Employee must deliver them to the Human Resources department, to be distributed at the Group's Christmas party.

Under no circumstance may an Employee accept travel or accommodation offered by GROUP Suppliers or suppliers of construction equipment or materials.

The offering of goods to any external entity is only admissible if carried out on behalf of the company, in accordance with common practices in the sector and country in question and must be approved in advance by the Executive Committee.

#### 9.5 Corruption and Bribery

The GROUP is committed to carrying out its business in an honest and transparent manner, following a zero-tolerance policy towards any practice of active or passive corruption and taking all measures to avoid it.

The GROUP is involved in a wide range of large-scale infrastructure investments and projects promoted by private and public companies, as well as government agencies and the like. We also interact with Regulators and inspection authorities. In any case, bribes, illegal commissions or payments or offers of any valuables that may unduly influence or reward a customer for ordering, purchasing or using our services are strictly prohibited, whether delivered directly or through a sub-consultant or any other agent.

All Employees must demonstrate an exemplary conduct, based on Integrity, Justice and Respect, values that are embedded in the rules that govern our behaviour. Therefore, all are required to:

- comply with all laws and regulations applicable in all countries in which we operate;
- abstain from any conducts that may implicate themselves, other employees or the GROUP in unlawful or unfair practices;
- refrain from any anti-competitive behaviour or practices;

No contract negotiation or performance shall involve any conduct or actions that are or could be considered active or passive bribery. No Employee or person associated with the GROUP may, directly or indirectly, grant any benefits, of any nature, to any third parties for the purpose of obtaining commercial or business advantages.

All Suppliers and Business Partners conducting business on our behalf must also meet these requirements.

#### 9.6 Commercial Fees and Agents

The GROUP may engage agents, intermediaries, or business representatives only when there is a legitimate business need, and their appointment is subject to prior approval by the Executive Committee.

Any commercial fees, commissions, or other forms of remuneration paid to such agents must:

1. Be reasonable, proportionate, and transparent, reflecting the nature and scope of the services provided.

2. Be clearly documented in a written agreement that specifies the scope of services, the fee structure, and the applicable legal framework.
3. Be in line with market practices and compliant with all applicable laws and regulations, including anti-corruption and anti-bribery legislation.
4. Be paid directly to the contracting entity or individual, never to third parties or anonymous accounts.
5. Be recorded accurately in the Group's books and records, in accordance with internal financial and compliance procedures.

In particular, the following rules apply regarding commissions and commercial fees:

- Fees between 1% and 5% of the contract value are admissible, provided that they comply with the conditions above.
- Fees between 5% and 10% require, in addition, that the Group's Legal and Compliance Officer conduct a Know Your Counterparty (KYC) questionnaire with the agent, in order to ensure that no special or undisclosed relationship exists between the agent and the Client.
- Fees above 10% are strictly prohibited under all circumstances.

Under no circumstances may agents or intermediaries be used to make improper payments, bribes, or to circumvent the principles of integrity, transparency, and fairness that govern the Group's activity.

## 10 PROVISION OF INFORMATION, REPORTS AND COMPLAINTS

### ***How should I proceed?***

*If I witness any behaviour that is not in line with the Code, I must inform the hierarchy, because that is what is expected of me.*

*I must not be conniving or complicit in a situation that destroys value and harms all those who are doing their job properly and giving their best every day.*

*By acting responsibly, I am ensuring the sustainability of the company and of all of us.*

The GROUP undertakes to maintain appropriate channels for complaining, reporting and/or obtaining clarifications on any matters contained in this Code.

The GROUP shall ensure discretion and non-retaliation in relation to any complainant, as well as the fair treatment of the persons involved.

To this aim, Employees must contact (at their discretion, as they deem most appropriate in view of the specific situation being reported):

### **The GROUP's Human Resources Department**

A/C: Dra. Gabriela Silva

Tel: +351 210 067 200

Email: gsilva@quadranteglobal.com

### **CEO of the GROUP**

A/C: Eng.º Nuno Costa

Tel: +351 210 067 200

Email: ncosta@quadranteglobal.com

## 11 NONCOMPLIANCE (Legal Notice)

The failure by GROUP Employees to comply with the principles and rules set forth in this Code may be considered a serious breach of conduct obligations and, consequently, such violations may give rise to the imposition of disciplinary sanctions or to the determination of potential criminal liability.

Within the scope of disciplinary responsibility, sanctions may include a written reprimand, fine, suspension, disciplinary dismissal, or termination.

In the case of Harassment, failure to comply with the principles and rules of this Internal Note may be considered a serious breach of conduct obligations and, consequently, may give rise to the imposition of disciplinary sanctions or the determination of potential criminal liability, under applicable Law, concerning the prevention of harassment in the workplace.

Within the scope of criminal liability, crimes of corruption and related offenses may be at stake, including the receipt and offer of undue advantage, embezzlement, economic participation in business, extortion, abuse of power, misconduct in office, influence peddling, and money laundering, as provided for in the Criminal Code, and punishable by imprisonment or a fine.

The aforementioned crimes, when committed by natural persons, might be punishable by prison sentences ranging from 1 (one) to 8 (eight) years, or by fines, which, in the case of the offenses in question, depending on local Law.

## **12 MONITORING AND REVIEWS**

The GROUP undertakes to periodically review, monitor and communicate its performance in terms of business ethics.

This Code of Ethics and Conduct was approved by the Board of Directors of the GROUP on 29/08/2018.