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## **POLICY OF CONSEQUENCES AND DISCIPLINARY MEASURES**

### **I- PURPOSE AND SCOPE OF APPLICATION**


The objective of this Policy is to inform, guide and discipline the conduct of collaborators/employees, members of Senior Management and third parties regarding the application of disciplinary measures to actions and conduct that do not comply with the internal and external rules of FCC S.A., such as the Code of Conduct, the Anti-Corruption Policy, the Conflict of Interest Policy, the Related Party Transactions Policy and other internal documents such as HR, and the Company Integrity Program.

### **II- PRINCIPLES AND DUTIES**

The administrators and collaborators/employees of FCC S.A must, among other commitments set out in its Code of Conduct and other internal rules of the Company (Code of Conduct, Anti-Corruption Policy, Conflict of Interest Policy, Related Party Transactions Policy, among others), be guided by the following principles guiding their duties:


- a) Guide its decisions and actions by ethics, integrity, transparency, loyalty, impersonality, professionalism and efficiency, considering the interests of FCC S.A and all its stakeholders, and the application of disciplinary measures must be guided by objectivity and clarity of your information defined and recorded.
- b) appropriation of resources and/or financial resources, fraud, personal advantage and influence peddling, among others, acting without concessions to the intervention of private, partisan or personal interests and favors, and encourage your colleagues, regardless of position and hierarchical level, to report or make any occurrence of these acts known to the appropriate channels, such as the reporting and ombudsman channel, as stipulated in the FCC S.A. Code of Conduct and its anti-corruption policy;
- c) Act honestly, transparently, politely, respectfully and with integrity when dealing with people, with the duty of those involved to maintain an open and integral stance and, always in the best interest of the organization's policies, avoiding dubious and contradictory conduct or contrary to the good customs of society, seeking to maintain the good reputation and credibility of the FCC.
- d) Act with justice, equity and impartiality in the application of disciplinary measures, in strict compliance with broad defense and due legal process;

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- e) Act in accordance with internal (anti-corruption, related party, conflict of interest and code of conduct policies) and external legislation (national laws with Anti-Corruption Legislation and Labor Laws, the Federal Constitution, the Civil Code and Criminal and others), not contradicting its principles, regulations and guidelines.
- f) Guide your business decisions and actions by ethics, integrity, transparency, loyalty, impersonality, professionalism and efficiency, considering your legitimate interests and those of all your stakeholders.
- g) Maintain confidentiality of privileged, strategic and confidential information;
- h) Combat the practice of insider information, that is, (relevant information that is still unknown by the market and/or has not been published, thus violating the duty of loyalty and transparency required by articles 153 to 157 and others of the Law 6,404/1976 and/or any operation carried out with securities issued by the company, aiming to make a profit for one's own personal benefit) and not associate with other companies that intend to manipulate prices or operate in the market using unfair or anti-competitive practices , defending the rules of free competition, regardless of the place of operation.
- i) Monitor corporate actions in order to preserve the legitimate interests of the FCC and its partners and ensure that the conduct of employees, third parties and everyone who acts on behalf of FCC and which may represent a conflict is investigated.
- j) Select and contract suppliers of goods or service providers through a regular public process, based on objective criteria of a technical nature/due diligence, avoiding favoring any interested company or manipulating proposals and prices.
- k) Act to avoid and prevent situations of conflict of interest, such as those set out in internal rules and policies, Conflict of Interest policies, Transactions with Related Parties and the FCC S.A. Code of Conduct;
- l) Act in good faith in carrying out the tasks provided for in employment contracts and in fulfilling obligations arising from the Code of Conduct and other standards, policies and procedures;

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- m) Report any and all risks to the integrity of the business, image, reputation and assets of the company, acting preventively;
- n) Not obtain personal advantages and privileges from any interested party (supplier, business partner, customers, among others) of the company, as referred to in Law 12,813/2013, in the Related Party Transactions Policy, Code of Conduct, Policy Anti-corruption, Conflict of Interest Policy, among others due to the position held in the company;
- o) Attend and participate in mandatory training as per standard and in all others where called upon by the Company

**III- ILLEGAL ACTS AND PRACTICES PROHIBITED BY THE INTERNAL AND EXTERNAL RULES OF FCC S.A AND BY THE COMPANY INTEGRITY PROGRAM**


FCC SA expects and demands from its employees, members of senior management, business partners and third parties that they act with integrity and ethics, respecting all laws, standards, codes and policies, and it is everyone's duty to promote the immediate and timely interruption of illegal activities to which they are aware and report them.

The Compliance/Integrity Program was even structured for this purpose: to prevent the occurrence of illicit acts contrary to laws, regulations and ethical standards to which our company is subject in the exercise of its activities, through the achievement of qualification, training, internal controls, procedures and policies aimed at avoiding, correcting and mitigating risks.

The main practices prohibited by national and international standards and the internal regulations of the FCC S.A. are:

- 1- Carrying out an act that constitutes corruption or fraud;
- 2- Promote political demonstrations in favor or against parties or candidates;
- 3- Failure to keep accounting records that clearly, accurately, diligently, precisely and transparently reflect the transactions carried out and/or that provide inadequate information to audits or supervisory bodies,
- 4- Hide or cover up illegal payments;

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- 5- Practicing conduct that distorts ethics and/or is discriminatory and prejudiced, whatever its nature: race, religion, sex, age, politics, nationality, marital status, sexual orientation, physical condition and/or threatening conduct, intimidating and abusive pressure, causing moral and/or sexual harassment;
- 6- Failure to comply with agreements and/or contracts signed, above all, with the Public Administration and/or relating to donations, sponsorships or public contracts;
- 7- Carry out parallel activities or employment that compete or conflict with the interests of the FCC S.A
- 8- Provide donations to public agents due to the position they hold.
- 9- Frauding a bidding procedure or administrative contract

#### IV- **DISCIPLINARY MEASURES**

Violations of the Code of Ethics, the Integrity Program and/or other internal policies or procedures and applicable laws will not be tolerated and may be subject to internal investigation via the Company's Reporting Channel or other means, giving rise to the following measures disciplinary and/or penalties:

- (i) **Verbal warning** – The Employee/Collaborator must be warned verbally by the responsible manager in a respectful manner and in an appropriate place, without suffering any type of exposure and/or unnecessary embarrassment, and it must be very clear why you are being warned that your attitudes and/or behaviors are not in accordance with the company's Standards, Policies and Code of Conduct and/or applicable laws in force.
- (ii) **Written warning** – It follows the same logic as the verbal warning, with the difference being the need to sign a specific warning form to be issued by the Human Resources area, containing a statement of the reasons for applying the measure. In case of refusal, two witnesses are requested to do so and this can be used in case of possible need in Court or in an internal or external investigation process;

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- (iii) **Suspension** – This is a measure used to penalize the employee in the event of a recurrence of warnings or in the event of a serious offense. There may be a loss of salary: (a) loss of the right to remuneration on days of suspension and paid weekly rest, (b) 1/12 of the 13th salary if the suspension is greater than or equal to 15 days and (c) change in the number of days or amount to be paid for vacation, as these days of suspension constitute an unjustified absence from work,


It should be noted that the suspension cannot exceed a period of thirty calendar days. In the event of repetition of faulty acts, more serious consequences may be adopted

- (iv) **Termination of employment contract:** This occurs if the measures previously applied prove to be ineffective or if the employee has committed a very serious offense.

It is equivalent to **dismissal without just cause**, with the employee being guaranteed the right to prior notice, accrued vacation plus 1/3, proportional vacation, proportional 13th salary, salary balance, fine on FGTS and right to withdraw FGTS deposits, as per provides for the Consolidation of Labor Laws on the subject through article 477 and following

- (v) **Termination of employment contract for just cause/dismissal for just cause:** occurs if the measures applied were ineffective or the employee committed a very serious offense. The rules set out in article 482 of the CLT must be met:
- a) Act of Improbability
  - b) Incontinence of conduct or bad behavior;
  - c) Habitual negotiation on one's own behalf or on behalf of others without permission from the employer, and when it constitutes an act of competition with the company for which the employee works, or is harmful to the service;
  - d) Criminal conviction of the employee, final and unappealable, if the execution of the sentence has not been suspended;
  - e) Neglect in performing their respective duties
  - f) Habitual or on-duty drunkenness
  - g) Violation of company secrecy;
  - h) Act of indiscipline or insubordination;
  - i) Job abandonment
  - j) Act damaging to honor or good reputation carried out in the service against any person, or physical offenses, under the same conditions, except in the case of self-defense, one's own or that of another;

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- k) Act damaging to honor or good reputation or physical offenses committed against the employer and hierarchical superiors, except in cases of self-defense, one's own or that of others;
- l) Constant practice of gambling.
- m) Loss of qualification or the requirements established by law for exercising the profession, as a result of the employee's intentional conduct.
- n) Acts that undermine national security duly proven in an administrative investigation


(vi) **Application of penalty provided for in contract and/or contract termination** (in the case of a partner or contracted third party: collaborator, employee, supplier, etc.): The application of the penalty resulting from non-compliance with FCC S.A.'s internal policies or possible unilateral termination/rescission will be considered on a case-by-case basis depending on the severity of the infraction, which may even lead to the personal liability of the agent who caused the deviation of purpose, of conduct, civil, administrative, criminal and other unlawful acts, including possible compensation for damages caused by their conduct.

Without prejudice to the disciplinary measures mentioned above, other measures of an educational and/or preventive nature may be applied, such as: training, changes in processes, establishment of additional controls, changes to systems or IT tools, etc.

#### IV. 1- TABLE OF CONSEQUENCES OF INFRINGEMENTS COMMITTED

GRAVITY	DISCIPLINARY MEASURE	SITUATIONS
<b>MINOR</b> (do not cause reputational or moral harm or physical or moral damage)	Verbal warning	1st occurrence
<b>MINOR</b>	Written warning	Recidivism
<b>MEDIUM</b> (generate losses, but reputational damage does not have lasting consequences and/or does not constitute physical or moral aggression)	Written warning	1st occurrence
<b>MEDIUM</b>	Written warning	Recidivism
<b>SERIOUS</b>	Suspension (maximum 30 days and without pay)  Dismissal without just cause (Art 474.CLT) or dismissal with just cause (Art 482, CLT)	1st occurrence

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<b>VERY SERIOUS</b> (cause significant material or reputational damage to the company, public administration, or even cause physical or moral damage to other people)	Dismissal with just cause (art 482, CLT)  Dismissal from the governance body of which he is a member.	Recidivism or not
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#### IV.2- DOSAGE OF DISCIPLINARY MEASURES


The dosage of disciplinary measures must consider, at a minimum, these factors:

- 1- **Gravity:** The penalty applied by the Manager must be directly proportional to the offense committed and to this end, the nature and severity of the offense must be taken into account, as well as its circumstances mitigating or aggravating the offense committed, the history of the transgressor and his responsibilities, the means used and the ends sought and the risks involved and the possible consequences of the penalty.

Examples of very serious infractions are:

- 1- Giving, promising, offering, authorizing, requesting or accepting, directly or indirectly, for yourself or for others, any undue advantage to a public official or person equivalent to him, which leads him to carry out or refrain from carrying out an official act or leads to to fail to act in accordance with the law.
- 2- Donate, even if not with resources from FCC S.A, but related to your name, any value, good, service, among others, to political parties, political campaigns or candidates for public office;
- 3- Offer, negotiate or make donations and sponsorships to any public agent to obtain some illicit consideration, even if the donation or sponsorship is made to a philanthropic, cultural, artistic or sporting organization;
- 4- Hide or disguise the nature, origin, location, disposition, movement or ownership of goods, rights or values arising, directly or indirectly, from a criminal offense;
- 5- Carry out transactions that could be used to finance terrorism;
- 6- Favor business partners when buying or selling products or hiring services to obtain personal advantages;

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- 7- Accept, promise, offer, receive or pay to individuals and legal entities, any amount of money, material goods and other private benefits, such as hotel room rates, show tickets, positions, in order to inappropriately influence or guarantee an advantage within relation to a business carried out with customers, representatives, contractors, third parties, their employees or public agents;
- 8- Sexually and morally harassing co-workers, professional clients or suppliers;
- 9- Discriminate against people based on origin, race, religion, social class, sexual identity or orientation, sex, color, age, physical disability or marital status or any other reasons;
- 10- Selling, using, keeping on company premises or being directly involved with drugs or narcotic substances;
- 11- Driving a Company vehicle or on company duty, under the influence of alcohol or narcotic drugs or with a suspended or expired license;


It is considered a very serious offense when the employee or member of senior management repeats a serious infraction for the second time for which he or she received the penalty of suspension.

These are examples of serious infractions:

- 1- Not collaborating with the prevention of workplace accidents and not using mandatory PPE;
- 2- Violating company secrecy and using confidential information, obtained through professional performance, for one's own benefit or that of third parties;
- 3- Negotiate, without the authorization of the person in charge, any property owned by the Company or clients that you have possession of;
- 4- Using one's position, function or influence to obtain personal advantages or favors;
- 5- Intentionally not provide information or provide it incorrectly or inaccurately, regarding your personal data or those of your relatives, necessary to formalize a contractual relationship, grant benefits and compensation;

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- 6- Offend, intimidate, harass or attack any person on the company's premises or any other place while carrying out activity, in the name or for the benefit of the Company;
- 7- Failing to report, immediately after becoming aware, signs or facts that may characterize illegal activities and transactions carried out in the name or for the benefit of the FCC S.A;
- 8- Regularly appearing drunk in the workplace;
- 9- Offering and/or receiving gifts, presents and hospitality with the aim of influencing the outcome of any type of commercial transaction;
- 10- Hide, tamper with, or omit information in any system, record, process and communication channel, or deceive internal and external auditors, private investigators and the like.

These are examples of medium infractions:

- 1- Being late and/or absent, repeatedly and unjustifiably, for professional commitments;
- 2- Acting carelessly and inattentively frequently;
- 3- Due to negligence, not providing information or providing it incorrectly or inaccurately, regarding your personal data or those of your relatives, necessary to formalize a contractual relationship, grant benefits and compensation.
- 4- Neglecting requests from the Information Technology area necessary for the support, development and security of equipment, software, systems and information, including accessing and storing files in violation of Company guidelines;
- 5- Disrespecting colleagues, subordinates, superiors, employees, members of senior management, competitors, customers and suppliers.
- 6- Failing to communicate facts that could constitute a conflict of interest, in accordance with the Code of Conduct and the Conflict of Interest Policy of FCC S.A;

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- 7- Carry out political-partisan or religious activities on the premises of FCC S.A, with the aim of influencing people and/or imposing opinions, causing harm to interpersonal relationships;
- 8- Failing to apply disciplinary sanctions for which he is responsible to employees, members of senior management or business partners, for any reason;

These are examples of minor infractions:


- 1- Delaying and/or being unjustifiably absent from a professional appointment, for the first time;
  - 2- Acting carelessly and inattentively for the first time;
  - 3- Using inappropriate, vulgar or inconvenient language when dealing with other people for the first time;
  - 4- Other conduct not considered medium, serious or very serious.
- 2- Present:** The disciplinary measure must be applied immediately after deliberating the consequence that will be applicable in the specific case so that the effectiveness of the application is guaranteed.
- 3- Causality:** There must always be a link, a direct link between the Improper Conduct and the Employee who will suffer the deliberate consequence for the specific case.
- 4- Equal Treatment:** As mentioned above, the decision on the consequence that will be applied in relation to a specific Improper Conduct cannot have discriminatory effects. All Employees who practice such Conduct must, considering the peculiarities of the specific case, suffer the deliberate consequence, regardless of their position or length of service.

#### V- DISCIPLINARY ACTIONS APPLIED TO BUSINESS PARTNERS

The sanctions applied to business partners who have any type of contractual relationship with FCC S.A will be provided for in the company's Code of Conduct, the Anti-Corruption Policy, the Conflict of Interest Policy and the respective contractual instruments and have the following sanctions as consequences:

- Formal warning or Extrajudicial Notification;
- Replacement of the third party offender in providing the service to FCC S.A;
- Collection of fines;

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- Termination;
- Exclusion of Donation or Sponsorship made by the Company;
- Impossibility of contracting, in the case of a contract no longer in force.

## VI. RESPONSABILITIES

The **Audit, Risks and Legal/Compliance** areas are responsible for:

- Clarify any doubts regarding the application of the guidelines set out in this document;
- Carry out continuous monitoring of the adoption of corrective measures established by the competent body, supervising their compliance
- Provide support to the Board of Directors in case of cooperation with Government Authorities.


The **Legal/Compliance and Human Resources** areas are responsible for:

- Provide support to the competent bodies by coordinating the investigation into the application of disciplinary measures;
- Receive reports from the Ombudsman and Investigative Areas; verify risks and recommend the application of disciplinary measures and dismissals, with or without just cause;
- Check and consider the Employee's Disciplinary History in merit assessments, promotions and role changes / transfers of locations or areas at the Employee's request.
- Apply the consequences provided for in this Policy, when requested

The **Ethics Committee** is responsible for:

- Ensure compliance with the code of conduct, establishing guidelines related to situations or topics contained therein, in order to define standards of behavior and application of sanctions;

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- Monitor internal investigation processes, as well as determine the appropriate disciplinary measures for the competent authority to apply, in case of violation of the precepts and guidelines established in the FCC S.A. rules, policies and code of conduct
- Approve any changes and revisions to this document, as well as regulate any omitted cases;
- Approve any and all cooperation decisions with Competent National and International Government Authorities

It is the responsibility of the Reporting Channel.

- Receive reports of incidents and send them to investigating areas;
- Offer solutions for incidents of violations of the Code of Ethics, current legislation and Internal Policies;
- Report indicators to the Ethics Committee.


## **VII- PROCESS OF DETERMINATION AND INVESTIGATION OF ILLICITS**

As we saw above, in Brazil, the application of disciplinary measures must occur according to the severity of the infraction and the damage caused, without prejudice to administrative, civil and criminal sanctions.

Abroad, the application of disciplinary measures will follow the same guidelines applied in Brazil, if it is possible to draw an analogy between the labor legislation of this foreign country and Brazil. If analogy is not possible, disciplinary measures will respect the legislation of the country where their application is necessary.

Therefore, disciplinary measures arising from common situations, such as unjustified absence, insubordination, indiscipline, etc., which do not constitute an obligation to report to the Ethics Channel, may be applied directly by the immediate manager.

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Verbal or written warning sanctions do not require an investigation process and can be applied by managers, through a simplified process of determining responsibility, whenever possible, with the collection of witnesses.

Suspension and dismissal sanctions must be preceded by an investigation or investigation process, carried out and/or coordinated, the latter in the case of hiring a specialized company, if applicable, by the Ethics Committee, following the hierarchical criteria defined for each committee. As referred to in the third chapter of this Policy, prior to proposing a disciplinary measure, the investigation coordinating body provided for in the Investigator Protocol must involve the Legal and Human Resources Departments, to obtain a technical analysis regarding the proportionality and legality of the measures to be proposals.

The group responsible for the investigation or investigation will carry out the process in an optimal time, and will present a report to the Ethics Committee, with the recommendation for the imposition of a sentence or acquittal. Such investigation and investigation processes must be conducted in a confidential and confidential manner.

## **VII – ETHICS CHANNEL**

As referred to in the related party transaction policy, code of conduct, conflict of interest and anti-corruption policy, the following are established as Reporting Channels

Website: (<https://denuncia.iauditcloud.com.br/fccsa>)

Email: [canaldedenuncias@fccsa.com.br](mailto:canaldedenuncias@fccsa.com.br)


Telephone: Dial 0800-9400158. Free call from anywhere in Brazil, Monday to Friday, from 8am to 6pm

In person: by prior appointment

## **VIII- FINAL DISPOSITIONS**

This policy is now in force for all employees, members of senior management, third parties, suppliers and business partners of the Company.

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Our company may, by its sole liberality or due to legislative changes, at any time, and must, every 2 (two) years, review the terms of this policy, and in case of changes it must be submitted for new approval.


This instrument is an integral part of the employment contract existing between the employee and FCC S.A. and is valid for as long as the employment contract is in force.

Any omissions, interpretations and exceptions must be taken to the consideration and decision of their respective committee.

#### **IX- RELATED DOCUMENTS:**

- Code of Conduct
- Anti-Corruption Policy
- Conflict of Interest Policy
- Related Party Transactions Policy
- CLT: Law 13467/2017, law 6514/1977, Decree 229/1997
- Criminal code
- Anti-Corruption Legislation
- Law 13 303- legal status of mixed capital companies and public companies
- Law 12813- Provides for Conflict of Interest in the exercise of a position or employment of the Federal Executive Branch and subsequent impediments to the exercise of the position or employment (Conflict of Interest Law).

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**ANNEX 1- AGREEMENT AND DECLARATION OF ADHERENCE TO THE POLICY OF CONSEQUENCES AND DISCIPLINARY MEASURES**

I declare that I have read and understood the Consequences and Disciplinary Measures Policy in force on this date, committing myself to fully adopt it during the execution of my duties, in all its terms, conditions and ethical principles, as well as to maintain the confidentiality of all and any information received in the course of my activities, including after the termination of my relationship with FCC S.A

I further declare that in case of doubt or knowledge of violations of this Policy, I will immediately inform the Integrity Committee, directly or through the Ethics Channel.

Name:

Collaborator

Partner

Registration:


CPF

CNPJ/ MF

Date:

Signature:

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**ANNEX II - DISCIPLINARY MEASUREMENT SCIENCE FORM**

**1- Employee Identification**

Name: \_\_\_\_\_

Area: \_\_\_\_\_

Job Title: \_\_\_\_\_

**2- Occurrence description** \_\_\_\_\_

Date of Occurrence: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

(describe the triggering event for the application of the disciplinary measure):

**3- Disciplinary Measure applied:**

Written Warning

Suspension –

Number of days: \_\_\_\_ . Start: \_\_\_\_/\_\_\_\_/\_\_\_\_. End: \_\_\_\_/\_\_\_\_/\_\_\_\_

Dismissal

Dismissal for Just Cause

**4- Responsible for the knowledge of the disciplinary measure:**

4.1- Hierarchical Superior, Representative of the People and Management area or Member of the Committee:

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

\_\_\_\_\_, \_\_\_\_ / \_\_\_\_ / \_\_\_\_  
(Place and date)


\_\_\_\_\_  
Collaborator Signature

\_\_\_\_\_  
Name of the Witness and CPF

\_\_\_\_\_  
Name of the Witness and CPF

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**ANNEX III - TERMS OF REFUSAL OF DISCIPLINARY MEASURES**

We inform that the employee (full name) refused to sign the Disciplinary Measure Acknowledgment Term that was presented with the description of the occurrence and the corresponding disciplinary measure.

The Disciplinary Measure Acknowledgment Term was read to the employee in the presence of two witnesses and he was informed that the refusal to acknowledge does not imply exemption from the application of the disciplinary measure.

\_\_\_\_\_, \_\_\_\_ / \_\_\_\_ / \_\_\_\_  
 (Place and date)

\_\_\_\_\_  
 Name of hierarchical superior, Representative of the People and Management area or  
 Member of the Committee

\_\_\_\_\_  
 Name of the Witness and CPF

\_\_\_\_\_  
 Name of the Witness and CPF

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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