

**ODEBRECHT**

**POLICY ON SUSTAINABILITY**

**ODEBRECHT S.A.**

**Odebrecht S.A. Policy on Sustainability**

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**Stakeholders**

Made up of shareholders, members, clients, users, partners, creditors, suppliers, external partners, service providers, surrounding communities, authorities, media, opinion leaders, business leaders, trade associations, NGOs, governments and regulatory and financing agencies that may affect or be affected by our activities, objectives or policies at Odebrecht S.A. or its Businesses.

**1. OBJECTIVE**

The objective of this Policy is to establish references for sustainability in our operations. The Policy contains definitions of basic concepts, as well as our commitments, indicators, roles and responsibilities on this issue.

Operating with focus on sustainability at Odebrecht S.A. is to conduct business in a way that generates positive results for all **Stakeholders**, today and in the future.

**Social and environmental risk**

Refers to the risk that an event resulting from failure or accident in operations or structures for which we are responsible may cause impacts to the environment or people or communities in areas influenced by such operations or structures.

**Materiality**

**Material topics** are those directly or indirectly affecting our capacity to create or preserve value, or the risk of destroying it in economic, environmental and social terms, using as reference our vision and that of stakeholders.

**Materiality** is the set of priority topics for which we should demonstrate capacity to identify risks and opportunities and to act effectively in relation to those that affect the creation of value.

**2. BASIC SUSTAINABILITY CONCEPTS**

Sustainability is the condition that takes place in a region, company or community resulting from the practice of sustainable development. Therefore, in this Policy, we will use the terms sustainability and sustainable development interchangeably in our vision as members of Odebrecht S.A.

The concept of sustainable development is present in the Odebrecht Entrepreneurial Technology ("TEO"), especially when we make the commitment to obtain results in our Businesses that ensure our survival and lead to our growth, contributing to the Group's perpetuity.

To Survive, Grow and Perpetuate, one of the pillars of TEO, presumes that we are responsible for the right to living of future generations, ensuring they encounter better conditions than the ones we received from preceding generations.

Acting towards sustainable development entails going beyond our duty to obey the laws and regulatory mandates. It means comprehending society's trends and priorities and adhering to global conventions and commitments applicable to each location where we operate, such as those regarding climate, biodiversity and human rights. It also means adequately conducting business operations to ensure proper management of **Social and Environmental Risks**.

Acting sustainably requires knowing and acting with priority in relation to our **material issues, evaluating the benefits to society resulting from the practice based on this Policy**. The effects of our activities extend to supplier chains and to members, communities, users and beneficiaries of the products and services delivered through our Businesses.

By combining innovation and sustainable development, we increase our capacity to deliver benefits to society through our products and services, improve our competitiveness and generate opportunities of business developments.

By practicing TEO and contributing to tangible and intangible results in sustainable development while serving society, we also earn recognition for our actions, generating brand value for Odebrecht S.A. and its Businesses.

Visit Odebrecht S.A.'s governance portal to see Odebrecht S.A. Policy on People Management.

### 3. COMMITMENTS TO SUSTAINABILITY

For us, working with focus on sustainability means serving society by fostering sustainable development with ethics, integrity and transparency. It means generating a balance of positive results to all stakeholders, today and in the future.

Our commitments to sustainability are the references we use to set priorities and goals in our Action Plans ("PAs").

These commitments can be broken down into:

**Commitment to people** – We foster sustainable development with an emphasis on people. We understand that people within and out the Odebrecht Group are the agents of change capable to identify and implement a sustainable development model adequate to each environment where we operate. Thus, we commit ourselves to creating a safe, healthy, motivating and discrimination-free work environment, with respect to human rights and to the differences among individuals. We value diversity in harmony with the provisions in our **Policy on People**.

**Commitment to economic development** – We contribute to development by delivering products and services necessary to society, while generating tangible and intangible results for clients, shareholders, financing agents, suppliers, members and communities, by the proper payment of taxes and the due respect to a fair and competitive business environment.

**Commitment to social development** – We extend the benefits to the communities surrounding our Businesses, harmonizing the achievement of economic results with social development when we:

**Life cycle of a product, project or service**

Consists in the life cycle for which a balance is sought between aspects and potential impacts (positive and negative) related to the commitments to sustainability, ranging from raw materials to the production process, or from the conception of a project or service to its implementation, including use / reuse or operation, until final disposal or the end of useful life.

Visit Odebrecht S.A.'s governance portal for Odebrecht's Policies on Compliance in Acting Ethically with Integrity and Transparency and Risk Management.

- promote productive social inclusion by generating opportunities for dignified work and income, contributing to improve life conditions in the communities, in aspects such as supporting development of local suppliers, professional training, education and sports, health and safety, among others;
- mitigate the negative social impacts of our operations; and
- conduct respectful relationships with distinct ethnic groups.

**Commitment to the environment** – We make decisions on projects, products and services considering **life cycles** in each case, the rational use of renewable and nonrenewable natural resources, cleaner technologies, efficient control of greenhouse gas emissions, reduction of waste and wastage, mitigation of operations environmental impacts and protection to ecosystems and biodiversity.

**Commitment to cultural values** – We contribute to preserve and value memorials, history and cultural heritage, respecting different usages and customs that differentiate nations and communities where we operate.

**Commitment to ethics, integrity and transparency in operations** – For us, acting with ethics, integrity and transparency is an essential requirement for sustainability, as the alignment of this Policy with the **Policy on Compliance in Acting Ethically with Integrity and Transparency** demonstrates.

**Action Plan Cycle:**

- Planning and agreement
- Follow-up
- Evaluation
- Judgment

Based on mutual trust, the team member negotiates the delegated responsibilities with his/her leader in order to turn the agreed terms into reality, and achieve tangible and intangible results, translating its commitment and goals into a PA pact.

#### 4. SUSTAINABILITY INDICATORS

We must demonstrate the results deriving from the practice of this Policy through indicators depicting how we achieve our commitments to sustainability.

Thus, the chief executive officer of Odebrecht S.A. (“DP-ODB”) must include sustainability indicators in his/her **Action Plan (“PA”)** to frame the pact on goals and subsequent follow up and evaluation. Specific guidelines on sustainability indicators will be prepared.



**Transversal Sustainability Forum**

Made up of the individuals responsible for sustainability from each of the Businesses in the Group as invited participants. The Forum has an advisory role with the following goals:

- align business practices of this Policy across the Odebrecht Group, preserving the conceptual unity and coherence of internal and external positions, respecting specificities of each Business.
- Propose improvements to this Policy and to other guidelines and sustainability practices of the Group.
- exchange experiences and share knowledge.

**5. ROLES AND RESPONSIBILITIES**

It is up to:

– **Chief Executive Officer of Odebrecht S.A. (DP-ODB):**

- To ensure implementation of this Policy within Odebrecht S.A. and, with due regard for the provisions in the Policy on Governance, to monitor the progress of the Businesses practices and performance results in sustainability;
- keep Odebrecht S.A.'s board of directors (“CA-ODB”) informed about our sustainability performance and the progress of the results measured by the Group’s Businesses common indicators ; and
- propose to the CA-ODB changes to this Policy so as to keep it permanently updated regarding the commitments and the evolution of the topic of sustainability from Odebrecht S.A.'s point of view.

– **Officer Responsible for Sustainability of Odebrecht S.A.:**

- support the DP-ODB in updating and practice of this Policy;
- support the members appointed by Odebrecht S.A. in the Businesses' boards dealing with sustainability topics in accordance with Odebrecht S.A.'s view.
- support the Communication and Sustainability RAF (Director) in preparing specific guidelines on performance indicators;
- propose and follow up the progress measured by common indicators to consolidate sustainability results within Odebrecht S.A.;
- ensure transparent and consistent communication of such results in the Annual Reports and Bulletins; and
- coordinate the **Transversal Sustainability Forum**.

- **Members of Odebrecht S.A.:**
  - We are the agents of change for sustainable development and responsible for actions deriving from the commitments in this Policy and of others pursuant to members of Odebrecht S.A. We are aware of the need to comprehend the meaning of sustainability in each and every environment where we operate, and that the consolidated results in this area contribute to how society recognizes our actions.

## **6. SCOPE**

The Policy on Sustainability of Odebrecht S.A. applies to its members and its controlled companies that do not have a board of directors.

Additionally, this Policy serves as a guideline for the Odebrecht appointed members of the boards of directors of its controlled companies, in alignment with other board members, to approve and implement a policy on sustainability containing principles, concepts and other guidelines on sustainability defined in this Policy. In addition, supplementing documents and directives may be necessary for the appropriate adaptation of the proposed policy to the characteristics of each respective Business and the interests of other partners.

## **7. ACKNOWLEDGEMENT AND CERTIFICATION**

All members of Odebrecht S.A. and its controlled companies that do not have a CA-Company and the PCAs-Company shall be aware of this Policy on Sustainability within no more than thirty (30) days as of its date of approval. Taking into account their specific scope of activities, each PCAs-Company shall discuss and approve a policy proposal similar to this one by its respective CA.

## **8. GENERAL PROVISIONS**

In the event of any doubt regarding the contents of this Policy, members shall seek clarifications with their direct superior or, if needed, with the officer responsible for sustainability at Odebrecht.