

ODEBRECHT

**POLICY ON
COMMUNICATION**

ODEBRECHT S.A.

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The practice of the Communication Policy will help ensure that stakeholders' perceptions of Odebrecht reflect its aspirations:

- To team members, Odebrecht is the **future**.
- To society, Odebrecht contributes to a **better world**.
- To **clients and users**, Odebrecht is a **model of efficiency and quality**.
- To government officials, Odebrecht is an **example of integrity and technical excellence**.
- To suppliers and service providers, Odebrecht is a **partner**.
- To young students, Odebrecht is an **ambition**.
- To the media, Odebrecht is **transparent and reliable**.
- To civil society organizations and academia, Odebrecht is **collaborative**.
- To trade associations, Odebrecht is **representative**.
- To the financial market, Odebrecht is **solid**.

Stakeholders:

include shareholders, team members, clients, users, partners, creditors, suppliers, external partners, service providers, surrounding communities, authorities, the media, opinion makers, business leaders, trade associations, NGOs, governments, regulatory agents and creditors and society in general that could affect or be affected by the activities, objectives or policies of Odebrecht or its Businesses.

Reputation: the perception held by the various stakeholders of the company, which is based on knowledge, expectations and accumulated experiences. It is the emotional and rational bond that creates a favorable or unfavorable predisposition of the company.

A good reputation:

- inspires trust
- influences value perception
- encourages competitiveness
- creates opportunities for new business

1. FOR TRANSPARENT AND STRATEGIC COMMUNICATION

Odebrecht S.A. (Odebrecht) is guided by its proprietary business technology, called the Odebrecht Entrepreneurial Technology (TEO), which is based on a humanist philosophy centered on values and on people's strengths, whose essence complements the commitment to create wealth for all **stakeholders** by conducting business ethically, with integrity and transparency. The way in which we conduct relations and communicate also must follow these principles.

At Odebrecht, we believe that communication is strategic, because it is the means through which we are perceived. Communication is fundamental for forging relations based on trust, for influencing and being influenced, for mobilizing strengths and for building or consolidating a **good reputation**. As such, our communication must be honest, accurate and consistent.

Through communication and relations with stakeholders, we share knowledge, information and aspirations, which are essential for satisfying the needs of clients and shareholders, for generating wealth and for benefiting society.

For Odebrecht and its diverse Businesses and Investments (defined below) to be recognized and admired, we must have visibility, act **transparently** and be connected, living in harmony with society.

2. THE ROLE OF TEAM MEMBERS IN COMMUNICATION

To us, being

transparent means:

- Dialoguing with team members and other stakeholders
- Communicating practices and attitudes
- Being accountable for our commitments
- Reporting results
- Being sincere in all relations
- Assuming mistakes
- Sharing knowledge

Image and Reputation

are built from the inside out. We consider the following definitions:

Image is how stakeholders interpret and perceive the company at a certain moment.

Reputation is a credit of confidence, admiration and respect accumulated over the years.

Examples of topics involving business security:

- Operational strategy
- Commercial information and negotiations
- Intellectual property
- Negotiations of lawsuits

We know that building, protecting and strengthening a good reputation for Odebrecht is a challenging and invaluable mission in which each of us team members must play a lead role.

We must:

- a) through our attitudes and behaviors, assume our individual and inalienable responsibility to help build and consolidate Odebrecht's **image** and positive reputation;
- b) act with integrity and contribute to the creation of an environment of trust in relations with each stakeholder;
- c) be committed to transparency and to clarity, objectivity and conviction so that external stakeholders understand who we are and how we are constructing our future; and
- d) safeguard the **business security** of sensitive and relevant information to which we have access by not exposing it to third parties through personal contacts or disseminating it on social networks and by respecting the spokespersons and the disclosure strategy managed by the Communications Director and their team, in coordination with the CEO-ODB.

Brand: built from the inside out, it is the essence, what gives it identity and differentiates it. The set of attributes, symbols and identity of a company.

3. OUR IDENTITY

The Odebrecht **brand** has a unique identity which is strengthened by the culture, by the diversity of our team members, by our conduct in accordance with the values and tenets of TEO and by the quality products and services we deliver to society.

Our identity is conveyed in all our expressions, such as our logo, language, editorial content, websites, **sponsorships** and social actions, as well as in our culture, in our policies, directives and corporate practices and in our stakeholder relations.

To ensure that our identity is well represented, gives direction to our organizational discourse and serves as the starting point of all our communication actions, we have defined a **brand strategy**, which is composed of a logo, a personality, a creative concept and a positioning.

**Capacity to dialogue,
in accordance with the
Policy on People:**

- We are committed to influencing and open to being influenced, in the pursuit of what is right;
- We listen attentively;
- We talk and write respectfully, clearly, transparently and accurately;
- We facilitate the exchange of ideas and seek alignment with everyone involved;
- We receive and give honest and constructive feedback;
- We adopt a tone of voice, posture and gestures that create empathy;
- We focus on solutions.

4. HOW WE COMMUNICATE

To ensure that our communication is transparent, effective and meets our stakeholders' needs for information, we have established a set of principles:

4.1. Ethics, integrity and transparency

We must, through our attitudes and behaviors and through the practice of TEO and the policies and other guidance documents of Odebrecht, demonstrate both internally and externally that we hold the convictions and are firmly committed to acting ethically, with integrity and transparency. Actions that demonstrate this practice strengthen the good reputation of Odebrecht and its role in the society.

4.2. Capacity to dialogue

As described in the People Policy, the capacity to dialogue must be exercised constantly by leaders and their team members. We prioritize communication and personal dialogue that facilitates interaction, the exchange of ideas and the pursuit of clear, transparent and precise alignment in order to influence and also be open to being influenced.

4.3. Spokespersons

We have spokespersons who are duly appointed and qualified to represent the company. Only spokespersons with the authority and legitimacy to speak on behalf of Odebrecht may represent it in interviews and interactions with the media, government officials and organizations.

Regardless, any interaction with the media always must be coordinated and accompanied by the Communication Director of Odebrecht or by member of their team.

If we are contacted by the media, we always must refer them and inform our leader and/or the Communication Director of Odebrecht so that they can adequately forward the matter.

Except for duly designated spokespersons, we, as team members, are not duly delegated to respond to the media on behalf of Odebrecht.

4.4. Style

Our preferred method of communication is verbal, which must be objective, direct, constructive and empathetic. Written communication, which is used to complement verbal communication, must be respectful, clear, simple, objective, accurate, light and fluid.

4.5. Channels

We adopt transparency and a formal and business style in our actions in multiple channels and vehicles, respecting the linguistic characteristics and profile of each one, and maintain an active presence on **social media**, establishing two-way communication.

The Communication Director of Odebrecht is responsible for determining on which channels we will maintain a presence and the content to be disclosed, as well as the adoption of the media plan aligned with the current moment of the company.

When using personal profiles on social media, we must distinguish our own opinions from the company's positioning and protect the confidential topics and reputation of Odebrecht.

4.6. Language

Although Brazilian Portuguese is the official language of Odebrecht, we recognize the rich linguistic diversity in the Group. As such, corporate communications, both internal and external (such as annual reports, policies, web content and relevant internal notices), that have international exposure must be published also in English and Spanish.

4.7. Corporate Memory

We preserve the historical heritage of the Odebrecht Group to perpetuate the corporate memory and preserve our history and culture. In this effort, we maintain our records and historical collections up-to-date and ensure that the content is available for consultation.

4.8. Indicators

Communication is efficient when it (i) is aligned with the brand strategy; (ii) strengthens stakeholder relations; (iii) promotes positive visibility; and (iv) contributes directly to building a good reputation.

Every communication action should have its effectiveness measured, with assessments conducted before and after, on an isolated basis (for each action) and as a whole (contribution to reputation). Results can be measured by using tools for monitoring media vehicles and/or opinion surveys conducted with specific scopes.

At the corporate level, indicators that measure the **quality of media exposure, the internal and external reputation** and the **maturity of the communication plan** are periodically monitored by the board of directors.

Media Exposure

Quality: evaluates the exposure of the Group's brands in the media (TV, newspapers, radio stations and internet) and on social media.

Reputation Score:

measures the degree of trust, admiration, respect and esteem of a company. The survey preferably should include the public, team members and strategic opinion makers.

Maturity of

Communication Plan:

matrix created to monitor the communication strategy and the performance of the Businesses and Investments of the Odebrecht Group with a view to strengthening the reputation.

5. STAKEHOLDER RELATIONS

To gain trust, empathy, respect and admiration, which are fundamental for a good reputation, we strive to conduct high-quality dialogues with all our stakeholders.

We work constantly to improve Odebrecht's relations with its stakeholders to ensure transparency, the exchange of knowledge, accountability and the evaluation of our initiatives.

Furthermore, each Odebrecht team must implement a strategic plan for relations with corresponding stakeholders, with leaders' Action Programs (APs) incorporating priority(ies) and goal(s) for their effective monitoring and assessment.

Guidelines on how to address relations with certain stakeholders follow.

5.1. Team Members

- That starting point of our communication is always us team members. We are the ones who build relations with other stakeholders both inside and outside of our professional activities. It is essential, therefore, that we be the first ones to learn of relevant information on Odebrecht and its Businesses and Investments, preferably from our leaders, through open dialogue.
- **Internal communication channels**, which are managed by the Communication Director of Odebrecht and their team, are complementary instruments which ensure that the company's strategy, information on transversal topics, material facts and corporate decisions are transmitted rapidly.
- The internal communication must help to disseminate and stimulate the concepts and practices of our culture, promote a positive

The **Directive on Communication with Team Members** establishes all guidelines and communication channels for the internal public.

Businesses: equity interests held in companies that consolidate a market segment, in which we hold control or shared control, with prospects for growth and remaining in the portfolio in the long term.

Investments: non-controlling interests in companies with prospects for value accretion and liquidity; equity interests in companies that consolidate a market segment, without prospects for growth in the long term; or interests in assets in the process of divestment.

workplace and leverage engagement with the objectives, goals and purpose of the Odebrecht Group to reinforce the sense of pride in belonging.

- In relations with the **Business and Investment** teams, the senior executives (RAFs) and their teams must, always respecting the Governance Policy, create an environment that promotes the capture of synergies and the exchange of experiences, knowledge and good practices that create value for the Business and/or Investment brands and consequently for the Odebrecht brand.

5.2. Society

- Communication must be treated as a priority and strategically for society in general, because it is the starting point from which Odebrecht's reputation is built.
- We must build a transparent relationship with society through – although not exclusively – constant dialogue with the media and opinion makers. For this, we must be disciplined in communicating clearly and in a timely manner Odebrecht's relevant information of interest to society.

5.3. Clients and users

Our Businesses and Investments satisfy the needs of clients and users through efficient and high-quality products and services. We maintain with our clients and users an open and transparent communication channel whose fundamental purpose is to satisfy their demands and needs.

5.4. Government officials

- Our relations with government officials in the various scopes and spheres of our activities and with their representatives and regulatory agents must be conducted ethically and transparently and in strict compliance with legal requirements and with the Policy on Compliance with Ethics, Integrity and Transparency.

5.5. Civil society organizations and academia

- Our interaction with **civil society** organizations and academia occurs through a convergence of common interests and commitments, whose main goal is the exchange of experiences and learnings. This relationship enables joint initiatives for benefitting society, understanding trends and expanding access to new technologies.

Civil society: refers to the group of voluntary organizations that serve as mechanisms for coordinating society

5.6. Trade associations

- We believe that industry representation, through active participation in trade associations, is a way to create relationships with legitimate interests. This representation is an important instrument for leveraging competitiveness, contributing to sustainable development and improving the business environment.
- Odebrecht's senior executives (RAFs) are responsible for identifying partner trade associations whose objectives are aligned with our company's strategy and purpose and for formulating action and relationship plans adapted to the organization's profile.
- Criteria such as reputation, business segments and recognition by regulatory institutions must be considered in the decision on the organizations with which Odebrecht should collaborate.

5.7. Suppliers and Service Providers

- Our suppliers and service providers are true partners and important players in building Odebrecht's reputation.
- We must be open to dialogue and, with transparency and a close relationship, keep them updated on and aligned with our policies and informed about our commitments, operations, business objectives and priorities.

5.8. Media

- The media plays an influential role in forming public opinion and in publicizing information about the world, including about the corporate world. For that reason, we must maintain constant contact with the media and a transparent and respectful relationship grounded in trust.
- We always strive to be proactive in disclosing material information about Odebrecht.
- We anticipate potential events with potential exposure for affecting Odebrecht's reputation.
- We work to accommodate their requests, without any distinction or discrimination of the subjects or types of vehicles, whether digital or conventional.
- We respond to requests from the media:
 - to provide information;
 - to give interviews;
 - to participate in debates or discussions; and
 - to uphold ethics and integrity in decisions and attitudes and to ensure transparency in the information disclosed.

5.9. Financial market

- Relations with financial institutions are based on reciprocity, straightforwardness and transparency. This posture ensures credibility and lasting relations.
- The CEO-ODB, the Financial, Planning and Investment Officer and their direct team maintains relations with banks and other financial market agents, within the scope of Odebrecht, which must be conducted continuously and transparently.

6. IMAGE CRISIS MANAGEMENT

Image risks are events that could impact stakeholders' confidence in Odebrecht's capacity to meet its commitments, principles, concepts and values and to act ethically, with integrity and transparency. Read more in the Risk Management Policy

An image crisis is a set of events that increases negative exposure and affects our main image asset: Odebrecht's reputation. Avoiding a crisis depends on identifying in advance the risks inherent to our activities that have the potential to generate negative exposure for our image. The role of leaders and their teams, with the support of the Communication Director at Odebrecht, is to identify **image risks**. Maintaining an up-to-date risk map and following the policies and guidelines help to protect Odebrecht's reputation.

The Communication Director of Odebrecht and their team must manage image crises in the following circumstances, always respecting the Corporate Governance Policy:

- a) when they involve facts that originated at Odebrecht;
- b) in the case of crises at the Businesses or Investments with the potential to impact the Odebrecht brand; and
- c) when they involve more than one Business or Investment.

Crises must be avoided when possible and mitigated, managed and communicated when inevitable. In the event of a crisis, we must understand the factor that generated it to adequately address the actions and ensure the expected resolution. We have procedures, training programs with simulations and clearly delegated responsibilities for dealing with crises.

7. FAR BEYOND WORDS

Communicating transparently and strategically is not simple, since it demands creativity and innovation and is everyone's responsibility. Communication goes far beyond written or spoken words or images. It is manifested by our gestures, signs, likes and shares, attitudes, capacity to dialogue while influencing and being influenced, capacity to listen and the tone of our voice. Communication is manifested by the Odebrecht brand itself. A brand with Brazilian roots and a global presence. A brand that inspires us to think, rethink and reinvent ourselves every day.

The Odebrecht brand is strengthened by our capacity to reflect on the spirit of the times in its constant evolution. It represents the realization of our purpose of continually advancing on the path to survival, growth and perpetuity, in search of a better world.

8. SCOPE

The Communication Policy of Odebrecht S.A. applies to all its team members, including the members of the BoD-ODB, members of Odebrecht S.A.'s fiscal council, as well as the team members of wholly owned subsidiaries that do not have their own board of directors.

This Policy also serves as guidance for the board members of the subsidiaries of Odebrecht S.A., appointed by it to support them, in coordination with the other directors, in approving and implementing a communication policy that contains the principles, concepts and other guidelines established and described in this Policy, while ensuring that they implement the complements and other guidelines required for adapting it to the characteristics of their respective business and to the contributions of the other directors.

9. ACKNOWLEDGEMENT AND CERTIFICATION

Within thirty (30) days of the approval of the Communication Policy, all team members of Odebrecht S.A. and its subsidiaries without a board of directors must declare that they have read and understood it, while the chairs of the boards of the Business must declare that they will present it to their respective boards to guide the discussion and approval of a similar policy.

10. GENERAL PROVISIONS

Given their responsibility to fully understand the Communication Policy, team members with questions about it must seek clarifications from their direct leaders or, if necessary, the Communication team of Odebrecht S.A.

11. COMPLEMENTARY DIRECTIVES

To complement the Communication Policy, the Communication Director of Odebrecht S.A. is responsible for publishing directives establishing guidelines relevant specifically to communication topics. A list of key topics follows, but other topics may be included over time.

- Sponsorships, donations and private social investment
- Activities in social media
- Communication with team members
- Media relations
- Crisis management
- Brand strategy