

POL 016 – Climate Change Policy

1. CONTEXT

The climate crisis may lead the planet to a dangerous and irreversible level of warming if concrete actions are not taken to reduce and neutralize global Greenhouse Gas (GHG) emissions and decarbonize the economy. Increasingly, society and organizations are at risk of suffering economic, social, environmental, and human losses caused by extreme weather events. In this context, the infrastructure sector, which is one of the most relevant for Brazil's socioeconomic development, faces significant challenges.

Aligned with internationally recognized agendas, Grupo CCR not only considers Climate Change one of the most complex and concerning issues of our time but also includes it among the material and cross-cutting aspects of its business strategy. By addressing the issue from both a risk and opportunity perspective in its decision-making processes, with engagement and oversight from top leadership, Grupo CCR aims to contribute to the transition toward a low-carbon economy, socio-environmental balance, and sustainable development throughout its value chain.

2. OBJECTIVES

2.1. POL 016 – Climate Change Policy (“Policy”) aims to establish commitments and guidelines for managing risks, impacts, and opportunities related to Climate Change in the businesses of CCR S.A. (“CCR” or “Company”) and its Subsidiaries (together, “Grupo CCR”), as well as for adapting to the effects of these changes and reducing Greenhouse Gas emissions in operations.

3. APPROVAL AND EFFECTIVENESS

3.1. This Policy was approved by CCR’s Executive Board on 11/07/2022 and will be effective as of 11/28/2022.

3.2. The ESG (Environmental, Social and Governance) area will be responsible for periodic reviews of this Policy, and the Compliance area will control its revisions.

4. APPLICATION

4.1. The provisions of this Policy apply to CCR and its Subsidiaries.

4.2. CCR will make efforts to ensure this Policy is also observed by Subsidiaries in which the Company holds joint control.

4.3. Grupo CCR will make its best efforts to ensure its Third Parties comply with the provisions of this Policy.

5. REFERENCES

5.1. This Policy was developed based on guiding documents from Grupo CCR and internationally recognized sustainability and Climate Change mobilizations/guidelines/agendas, including but not limited to:

- i. CCR Group Code of Ethical Conduct
- ii. POL 001 – Clean Company and Anti-Corruption and Anti-Bribery Policy
- iii. POL 010 – Consequence Management and Non-Retaliation Policy
- iv. Internal Regulations of the Board of Directors and Advisory Committees
- v. CCR Group Reference Form
- vi. United Nations Sustainable Development Goals (SDGs)
- vii. UN Global Compact Principles
- viii. Global Reporting Initiative (GRI)
- ix. Disclosure Insight Action (CDP)
- x. Sustainability Accounting Standards Board (SASB)
- xi. Greenhouse Gas Protocol (GHG Protocol)
- xii. Carbon Efficient Index (ICO2 B3)
- xiii. Task Force on Climate-Related Financial Disclosures (TCFD)
- xiv. Science-Based Target Initiative (SBTi)
- xv. Intergovernmental Panel on Climate Change (IPCC)
- xvi. Paris Agreement

6. DEFINITIONS

6.1. The following terms, when capitalized, singular or plural, masculine or feminine, are used in this Policy with the meanings specified below:

Adaptation to climate change: the process of adjusting natural and human systems to actual or expected climate and its effects.



Administrators: statutory directors and members of the Board of Directors of CCR and its subsidiaries.

Employees: all employees, including non-statutory directors, of Grupo CCR.

Subsidiary: any company in which CCR holds shareholder rights that ensure, individually or through a voting agreement, and permanently, a majority in corporate decisions and the power to elect most administrators.

ESG: Environmental, Social and Governance

Greenhouse Gases (GHG): gaseous constituents of the atmosphere, both natural and anthropogenic, that absorb and emit radiation at specific wavelengths within the thermal infrared radiation spectrum emitted by the Earth's surface, atmosphere, and clouds.

GHG Emissions Inventory: a report presenting the emissions and sources of GHGs of an organization, prepared annually by CCR based on the internationally recognized GHG Protocol methodology.

- Scope 1: Direct emissions of Greenhouse Gases from the reporting organization, originating from sources that are owned or controlled by the organization.
- Scope 2: GHG emissions from the reporting organization related to the generation of electricity, heating or cooling, or steam purchased for its own consumption.
- Scope 3: Indirect GHG emissions from an organization not included in Scope 2.

Mitigation of climate change: human intervention to reduce sources or enhance sinks of GHGs.

Climate Change: long-term changes in temperature and weather patterns.

Climate Risk: the possibility of negative impacts on human and natural systems due to climate events.

Physical Risk: a type of Climate Risk that threatens the integrity of physical structures and population safety.

Transition Risk: a type of Climate Risk occurring during the transition to a low-carbon global economy, which may be regulatory, technological, market-related, or reputational.

Third Party: any individual or legal entity or unincorporated entity with which Grupo CCR has or may have a relationship.

Business Units: controlled companies and internal divisions (branches with specific objectives), including GBS.

7. GENERAL PROVISIONS

7.1. Grupo CCR is committed to the international effort to limit global warming to 1.5°C by 2033, as defined in the Paris Agreement, through targets and measures to reduce GHG emissions in its operations and the strategic management of risks and opportunities related to Climate Change.

8. CCR GROUP GUIDELINES ON CLIMATE CHANGE

The Climate Change Policy of Grupo CCR establishes four main guidelines: (i) Governance and Culture; (ii) Mitigation and Adaptation; (iii) Integrity and Transparency; and (iv) Engagement and Leadership. These guidelines are broken down into 14 commitments, as detailed below:

8.1. GOVERNANCE AND CULTURE

8.1.1. Develop processes for implementing and continuously improving governance, strategy, management, metrics, and targets for Climate Risks and opportunities, considering TCFD recommendations and other applicable regulations, as well as the potential Brazilian carbon market and new market institution guidelines (e.g., CVM and Central Bank of Brazil).

8.1.2. Include criteria in decision-making processes to prevent or reduce Climate Change impacts, including avoided or generated GHG emissions in the economic feasibility analysis of Grupo CCR projects, prioritizing cost-effective emission reduction initiatives.

8.1.3. Establish a climate action plan to guide Grupo CCR in implementing measures based on this Policy and promote the topic in daily operations and company culture.

8.1.4. Share information and knowledge across the value chain about the social, environmental, and economic impacts of Climate Change that may directly or indirectly affect Grupo CCR's business and stakeholders, including clients and Third Parties.

8.2. MITIGATION AND ADAPTATION

8.2.1. Identify Climate Risks (Physical and Transition Risks) in Grupo CCR's areas and divisions, recognizing Climate Risk as an investment risk and seeking opportunities related to Climate Change (new businesses, markets, products, and services that enable GHG emission reductions).

8.2.2. Map engagement opportunities with stakeholders to understand the social, environmental, and economic impacts of Climate Change and implement corresponding Mitigation and Adaptation actions.

8.2.3. Strengthen the sustainability culture in Grupo CCR's supply chain, aiming to engage Third Parties in Climate Change and ESG topics.

8.2.4. Periodically set emission reduction targets for Grupo CCR's Business Units, encouraging the development and adoption of low-carbon solutions and more efficient technologies.

8.2.5. Promote the reduction of GHG emissions associated with production processes, natural resource consumption, transportation, logistics, waste and effluent management, and other operations in Grupo CCR's value chain.

8.2.6. Encourage technological innovation and study carbon market mechanisms to reduce GHG emissions and manage Climate Risks in Grupo CCR's asset chain and Third Parties.

8.3. INTEGRITY AND TRANSPARENCY

8.3.1. Prepare and publish annually the GHG Emissions Inventory of CCR and its Subsidiaries, submit it to independent third-party verification, and implement

a quality management process for sustainability indicators related to Grupo CCR's emission sources.

8.3.2. Disclose norms, policies, and guidelines related to Climate Change to Employees, Investors, Third Parties, and other stakeholders to encourage engagement and recognition of Grupo CCR's actions.

8.4. ENGAGEMENT AND LEADERSHIP

8.4.1. Participate in intra- and inter-sectoral initiatives on GHG emissions management and Climate Risk management to improve Grupo CCR's capacity for accounting, reporting, and implementing Mitigation and Adaptation measures.

8.4.2. Participate in national and international forums and initiatives on Climate Change, such as the Brazilian GHG Protocol Program, CDP (Disclosure Insight Action), UN Global Compact, among others, to anticipate trends and enhance the company's positioning and strategy on the topic.

9. RESPONSIBILITIES

9.1. CCR Board of Directors (CA-CCR)

- (i) Annually approve the Company's Global Reporting Initiative (GRI);
- (ii) Monitor ESG-related topics with the support of CA-CCR Advisory Committees.

9.2. People and ESG Committee ("CG&ESG")

- (i) Monitor compliance with the ESG Master Plan, which includes the Company's actions related to environmental (including GHG Emissions), social, and governance issues relevant to its business, presenting any recommendations for changes or additional measures to the CA-CCR;
- (ii) Monitor and anticipate trends in global ESG topics, identifying critical issues that represent improvement opportunities, risks, or that may have a significant impact on business, stakeholder relationships, Grupo CCR's image, and its short-, medium-, and long-term results.

9.3. Audit, Compliance and Risk Committee (“CAC”)

- (i) Monitor the Company’s risk exposures, the adequacy of mitigation plans, and the effectiveness of internal controls, eventually proposing changes to improve the effectiveness of control processes, especially in high-risk areas.

9.4. Vice Presidency of Governance, Risk and Compliance (also responsible for CCR’s ESG area):

- (i) Periodically report to CG&ESG on ESG topics that are addressed transversally within Grupo CCR;
- (ii) Monitor the reporting of GHG Emissions Inventory information and the actions for controlling and reducing GHG emissions.

9.5. Communications Department

- (i) Develop the communication approach to stakeholders regarding public commitments to control and reduce GHG emissions.

9.6. ESG Area

- (i) Promote a sustainability culture and Climate Change management throughout Grupo CCR, addressing these issues as strategic, cross-cutting, and material;
- (ii) Execute sustainability reports and questionnaires, ensuring the flow of information related to the topic for all Grupo CCR stakeholders;
- (iii) Ensure the integrity of the information described in the reports;
- (iv) Monitor and follow up on the implementation of sustainability guidelines and targets validated by Grupo CCR;
- (v) Promote compliance with the guidelines and practices defined in this Policy for all stakeholders;
- (vi) Participate in internal or external initiatives related to Climate Change to monitor, promote, review, and update the Company’s and its Subsidiaries’ actions;
- (vii) Monitor the achievement of reduction and offset targets for unavoidable GHG emissions.

9.7. Engineering, Pavement, Fleet, Innovation and other relevant areas

- (i) Identify and study the technical and economic feasibility of less GHG-intensive technological alternatives;
- (ii) Promote the dissemination of energy efficiency improvement practices adopted by each operation among the Business Units.

9.8. Business Units

- (i) Monitor and validate data for sustainability reports (GRI, ISE, GHG Protocol, CDP, and other reports, indexes, and initiatives related to the topic);
- (ii) Map and monitor GHG emission sources and implement initiatives that promote the reduction of these gases;
- (iii) Identify and manage Physical Risks inherent to each CCR Group Modal.

9.9. FINAL PROVISIONS

10.1. Non-compliance with the provisions of this Policy will subject Administrators and Employees to applicable disciplinary actions under the “POL 010 – Consequence Management and Non-Retaliation Policy” of Grupo CCR, without prejudice to other applicable legal measures.

10.2. Additionally, Grupo CCR encourages its Employees or Administrators, as well as any Third Parties, to report any known or suspected violations of company policies, standards, or applicable laws through the following channels:

Channel	Access
Web	https://canalconfidencial.com.br/canalconfidencialccr/
Phone	0800 721 0759

10. VERSION CONTROL AND HISTORY

Date	Version	Summary
01/01/2002	0	NO CCR 019-0 – Corporate Climate Change Policy (Creation of Normative Tool)
25/06/2014	1	NO CCR 019-1 – Corporate Climate Change Policy (Revision of Normative Tool)
01/06/2016	2	NO CCR 019-2 – Corporate Climate Change Policy (Revision of Normative Tool)

28/11/2022	3	POL 016 – Climate Change Policy (General update to expand ESG scope)
------------	---	--

11. APPROVALS

Code	Description	Version	Effective Period
POL 016	Climate Change Policy	3	De 28/11/2022 to 28/11/2024

ISSUER: Onara Lima de Oliveira

REVIEWER: Pedro Paulo Archer Sutter

APPROVER: CCR Executive Board (RDE 11/07/2022)
