

SUSTAINABILITY REPORT 2024



Summary

1

INTRODUCTION

About the Report..... 4

Letter from the CEO..... 5

2

ABOUT US

Highlights of the year..... 8

Awards and recognition..... 9

Performance overview..... 11

Financial performance..... 14

Operational performance 15

3

GOVERNANCE

Corporate governance..... 18

Organizational structure..... 19

Ethics, integrity and compliance..... 24

4

ESG AGENDA

ESG strategy..... 30

ESG commitments..... 31

Materiality 33

5

INNOVATION

Drive for innovation 35

Methodologies and processes 36

Technology and digitalization 39

Customer-focused innovation 42

6

ENVIRONMENT

Environmental management..... 47

Emissions..... 50

Energy..... 53

Water..... 55

Biodiversity..... 57

Waste and materials 57

7

OUR PEOPLE

Employees..... 61

Operational health and safety..... 74

Human rights..... 80

Community relations..... 82

8

ATTACHMENTS

GRI Content Index 92

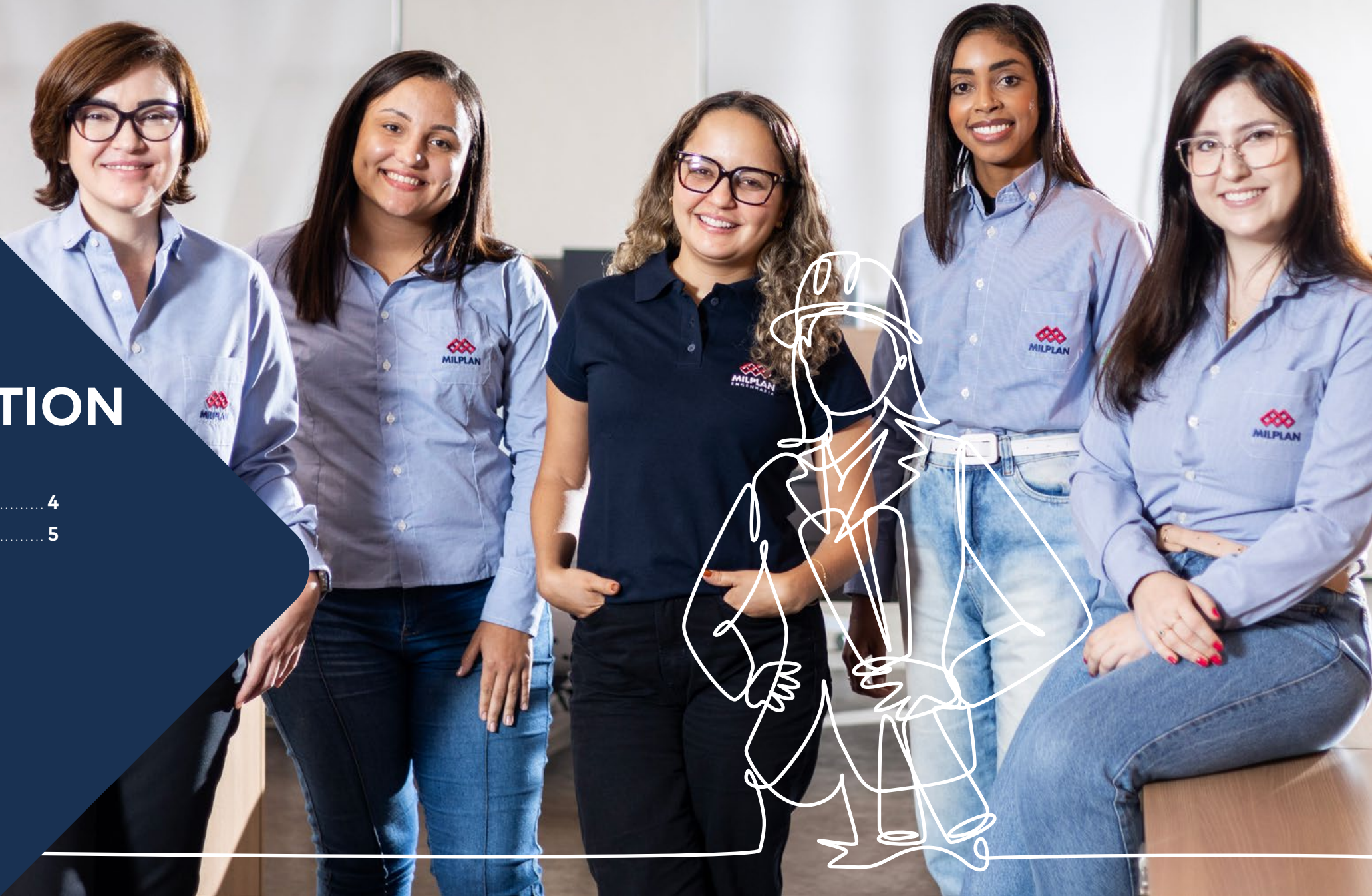
Credits..... 103



1

INTRODUCTION

About the Report.....	4
Letter from the CEO	5



About the Report

GRI 2-3

We present MILPLAN's Sustainability Report annually, for the third consecutive year. This report summarizes the company's development, challenges, opportunities, and successes from January 1 to December 31, 2024, focusing on financial, environmental, social, governance, and innovation issues. Its goal is to showcase the important activities and practices implemented during the year, emphasizing our commitment to transparency and corporate responsibility.

The structure and content are based on the GRI Standards of the **Global Reporting Initiative (GRI)** and aligned with the **Sustainable Development Goals (SDG)** considered a priority by MILPLAN. The indicators presented refer exclusively to operations under the company's full control. Information on the consortiums in which we participate is mentioned, but does not integrate the indicator base of this report.

If you have any questions or suggestions, please contact us by e-mail: responsabilidade.social@milplan.com.br

 [CLICK HERE](#) to
learn more



The
publication
was done on
08/29/2025.

READING TOOLS



In the chapters and sub-chapters throughout the document, the GRI Standards indicators are labeled with the symbol "**GRI XXX-X**", identifying the topics reported in accordance with international sustainability standards. The full indicator index can be found on page 92. More information on the GRI is available at: www.globalreporting.org



This report is consistent with the United Nations (UN) 2030 Agenda, which lays out the 17 Sustainable Development Goals (SDG), addressing environmental, social and economic topics. The full mapping of the SDGs prioritized by MILPLAN and their connection to the reported content can be found on page 92. For more information go to: www.odsbrasil.gov.br

Letter from the CEO

GRI 2-22

I am glad to introduce the 2024 Sustainability Report from MILPLAN. Our dedication to our purpose of "Building a better and sustainable Brazil" and to our core values — particularly those of occupational safety, ethics, transparency, and sustainable development — which serve as foundations for our decision-making and as a reminder of our accountability to all of our stakeholders — are reflected in this document.



The year has been affected by challenges in the macroeconomic scenario, such as inflation, rising interest rates and a shortage of skilled labor. Even so, we showed resilience and retained a balanced financial base, with consistent cash generation, liquidity and a low level of debt.

On the operational front, we had important milestones over the year. We successfully completed the external audit to **recertify our Integrated Management System (IMS)** and invested in expanding and upgrading our equipment, **renewing part of our crane fleet.**

We have also **consolidated the core routines of Lean Construction and AWP**, managing to achieve 95% adherence to the proposed practices by the end of the year, reducing waste.

We continue to expand and consolidate the use of BIM (Building Information Modeling) methodology on our construction sites, a methodology that has proved crucial to increasing productivity, reducing rework and improving the control of activities on construction sites.

The year also saw important advances in the ESG agenda. We implemented our **ESG Policy**, which will be integrated into our operations as a strategic guideline. This progress represents more than an adjustment to market requirements - it expresses our conviction that MILPLAN's growth must go hand in hand with environmental, social and governance responsibility.

We continued our **solid performance in the main sectors of primary industry**, invested in the development of the surrounding communities and expanded our programs to strengthen the organizational culture. For the second year running, we were certified by the **Great Place to Work (GPTW)**. We were also recognized with the **"Incredible Places to Work" award from the Fundação Instituto de Administração (FIA)**, confirming our employees' positive perception of the work environment we are building - more collaborative, inclusive and inspiring.

I am proud to highlight the actions aimed at improving our workforce through the Capacitar Program, including Women MIL, which **promotes gender equality by training women** to work in industry, and the training of Civil Society Organizations (CSOs) through the MIL Impact Program. These initiatives contribute to a fairer, safer and more welcoming environment, with a focus on expanding employability opportunities and building a more equal and diverse industrial sector. We remain committed to **inclusion and accessibility**, promoting the correct inclusion and hiring of people with disabilities (PWD) in our workforce. In 2024, we signed an important **partnership with PCD & Você**, which has been instrumental in building a more inclusive work environment.

Valuing people remains a priority. We restate every day that "life is our greatest value", **conducting our activities with strict compliance with safety standards, the Golden Rules and care for occupational health**. An example of this was the launch of the Movimenta MILPLAN program, an internal initiative to encourage physical activity, which promoted well-being and integration among employees. We also renewed our commitment to social investment: **over BRL2.9 million was invested in social projects**, benefiting 42 institutions in the areas of culture, sport, social assistance and education, among others.

We have continued to prioritize **operational excellence, human care, and the ongoing pursuit of innovation** despite the challenges presented by the current economic climate and the rising expectations of the market. We think that how we manage our resources, cherish our employees, take care of the environment, and behave honorably and openly are all directly related to how sustainable our company is.

We conclude this cycle with a sense of institutional maturity and the assurance that we are prepared to responsibly construct the upcoming chapters of our history.

#SOMOSMILPLAN and we keep going together, dedicated to a more sustainable future for everybody.

LEONARDO MENDES,
MILPLAN's CEO.

2

ABOUT US

Highlights of the year	8
Awards and recognition	9
Performance overview	11
Financial performance	14
Operational performance	15



Highlights of the year



Articuladores do Saber Program

Created to value and disseminate employees' tacit knowledge.



Social Projects Portfolio

To structure its social investment, MILPLAN has created a portfolio of replicable projects in all the territories where it operates, ensuring that the actions are aligned with the demands of the company and the communities. In **2024** there were:

MULHERES MIL

Training **60 women** to work in the industry.

impact mil

Training for **18 Organizations** close to the Headquarters and the Branch.

recria mil

Training in the reuse of uniforms for **15 people** from Ouro Branco/MG, **93%** of whom were **PWD** (People with Disabilities).



Culture

Strengthening the organizational culture by training the workforce.



BRL 2,941,526.19

Invested in social responsibility.



Innovation

Completion of the implementation of Lean (LPS) routines on construction sites and strengthening the use of AWP and BIM.



Inclusion

Partnership with PCD & Você to foster a more accessible and inclusive environment at the M.444 construction site in Ouro Branco (MG).



Conducting **775 training sessions**

focused on the **Environment**, totaling **27,495** man-hours of training.



Information Hub

With data integrated into a single source, the Hub boosts a data-driven culture, increases team autonomy and reduces rework when consulting consolidated information.

Awards and recognition

**Great
Place
To
Work®**

GREAT PLACE TO WORK (GPTW)

In 2024 we were certified by GPTW for the second year in a row, a recognition that mirrors our employees' positive perception of MILPLAN's culture and organizational climate. Every day, we strive to build a collaborative, inclusive and inspiring work environment. In 2024, we ranked 14th among large companies in Minas Gerais.

FEEX FIA

The Employee Experience (FEEx) survey, conducted by the Fundação Instituto de Administração (FIA), is the basis for the Incredible Places to Work Award, in which MILPLAN was recognized. This result underlines our ongoing commitment to improving practices and fostering an ever-better environment for our people.

HYDRO'S SUPPLIER DEVELOPMENT PROGRAM

In 2023 and 2024, we participated in HYDRO's Supplier Development Program, applying the Ethos indicators and developing an action plan to improve our practices. At the close of the cycle, we were recognized by HYDRO as outstanding suppliers in terms of sustainability.



PETROBRAS' BEST SUPPLIERS

We were recognized with the Petrobras' Best Suppliers 2024 Award, in the Onshore Engineering Works category, during ROG.e 2024. The award spotlighted the companies with the best performance in delivering goods and services over the past year.



3A PROGRAM (ANGLO AMERICAN)

A total of 12 MILPLAN employees were recognized by Anglo American's 3A Program, which distinguishes professionals for their commitment to daily activities and their care for their own safety and that of their teams. This achievement reinforces one of our core values - safety - and reaffirms our ongoing commitment to this principle.

IMS RECERTIFICATION

MILPLAN has successfully completed the External Recertification Audit of its Integrated Management System (IMS), which covers the ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 standards. The audit covered the headquarters in Belo Horizonte (MG) and projects M.439 and M.441.

ERO RECOGNITION

CBE Consortium is highlighted in HSE by ERO COPPER.

The Boa Esperança Consortium (CBE), a partnership between MILPLAN and Reta Engenharia, has reached another safety milestone: SIX MILLION man-hours worked with NO lost-time accidents.



VALOR 1000 AWARD

The "Valor 1000 Award" is an annual award organized by the Valor Econômico newspaper to recognize the biggest and best companies in Brazil.

We reached 812th place, moving up 63 places in relation to the previous year.

BEST SUPPLIER AWARD

MRF Consortium receives outstanding award. The MRF Consortium, a partnership between MILPLAN, Reta Engenharia and Flapa Engenharia, was recognized as the outstanding supplier in Health, Safety and Environment in 2023/2024 by Samarco.



BRAZILIAN ENGINEERING RANKING



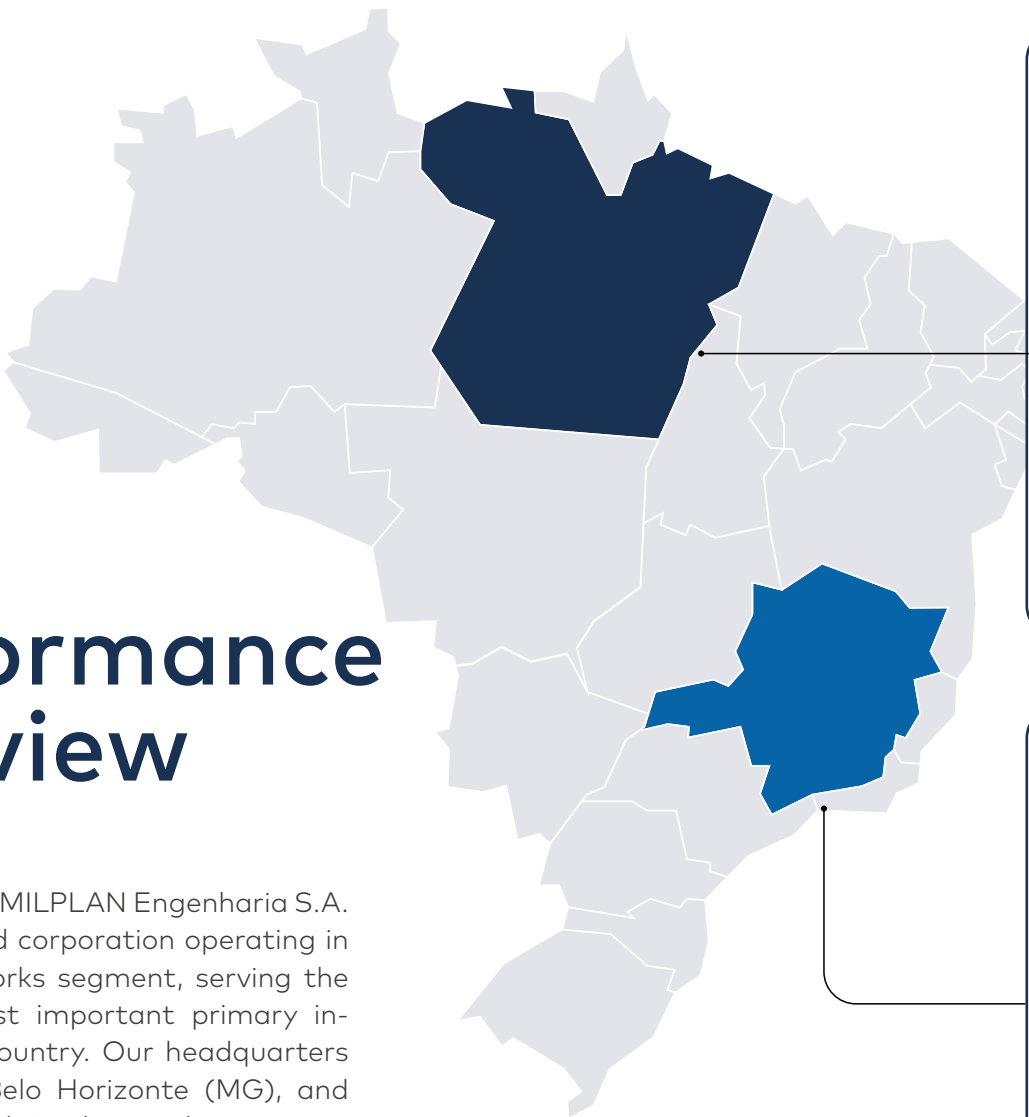
The 500 Largest in Construction Ranking, published by O Empreiteiro magazine, lists the largest construction companies in Brazil.

We were recognized as the 5th largest industrial assembly company in 2024.

Performance overview

GRI 2-1 | 2-6

Founded in 1982, MILPLAN Engenharia S.A. is a privately held corporation operating in the industrial works segment, serving the largest and most important primary industries in the country. Our headquarters are located in Belo Horizonte (MG), and we have a branch in the northern region, in Canaã dos Carajás (PA), as well as eight of our own projects spread across various regions of Brazil and four projects through three different consortiums.



- Completed
- In progress

- M.434 (Consortia)** - Civil construction, earthworks and electromechanical assembly in Tucumã (PA)
- M.435 (Consortia)** - Electromechanical assembly in Conceição do Araguaia (PA)
- M.436** - Project to replace sections of pipeline in Paragominas (PA)
- M.440** - Electromechanical assembly of equipment, substations, metal structures, boilermaking and peripherals in Canaã dos Carajás (PA)
- M.442** - Electromechanical assembly of relocatable transportation and substations in Canaã dos Carajás (PA)
- M.443** - Electromechanical assembly works in Canaã dos Carajás (PA)

¹ The M.435 project was completed in January 2025.

- M.419 (Consortia)** - Earthworks and civil construction in Mariana and Ouro Preto (MG)
- M.438** - Civil construction work, electromechanical assembly, disassembly and relocation of sheds, containers, tents and floor preparation in Conceição do Mato Dentro (MG)
- M.439** - Electromechanical assembly works in Ouro Branco (MG)
- M.441 (Consortia)** - Infrastructure, civil and electromechanical assembly in Mariana (MG)
- M.444** - Electromechanical assembly and railway terminal in Ouro Branco (MG)
- M.445** - Electromechanical assembly and civil construction in Ouro Preto (MG)

Through safe, effective, and sustainable action, we want to positively improve the nation's primary industries. We aim for operational excellence, innovation, and tailored solutions that create value at every project stage with a committed workforce.



PURPOSE

To build a better and sustainable Brazil



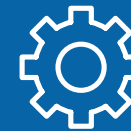
VISION

Achieving excellence in industrial projects, with transformative people



VALUES

Safety	Simplicity
Ethics	Customer focus
Collaboration	Results orientation



BUSINESS

Contributing to our client's success by providing effective solutions for industrial projects.

GRI 2-6

We offer a robust portfolio of services for the primary industry, working in the country's main productive sectors. We operate with flexibility and high technical standards, tailoring our deliveries to the needs of our clients and projects. The infographic on the side shows our operations, organizing the segments we serve, the activities we carry out and the different types of contracts we use. This integrated vision reveals our ability to deliver comprehensive solutions, contributing to the success of the projects we take part in.



Financial performance

GRI 3-3 | 201-1

In 2024, we kept a solid financial base, with positive EBITDA, consistent cash generation, a good liquidity ratio and low debt, confirming the sustainability of our business model, even in a challenging scenario for industrial construction. Factors such as inflation, high interest rates and a shortage of skilled labor impacted operating costs and reduced net profit.

To preserve our financial health, we continue to have strong control over costs, expenses and investments, through continuous analysis of billing and expenses, compliance with deadlines for financial reports and risk management. We monitor these actions with audits, market analysis, tax monitoring and periodic reports.

Our governance comprises weekly meetings at the construction sites, fortnightly meetings with the PMO, as well as PROJEC (Economic Projection with the Executive Committee), AGM-O (Management Assessment of the Works with the Operations Director) and AGM MILPLAN (Strategic Analysis with Fundação Dom Cabral). This continuous monitoring has made it possible to cut report delivery times and speed up decisions. Contributions from the relationship network also drove improvements in processes, automation and efficient use of the ERP, strengthening responsible and effective financial management.

STATEMENT OF ADDED VALUE (BRL THOUSAND)

	2022	2023	2024
Revenue	972,627,287	1,148,628,988	1,139,268,971
Inputs purchased from third parties	441,899,372	524,168,035	505,460,649
Gross added value (1-2)	530,727,915	624,460,953	633,808,322
Retentions	0	0	0
Net added value produced (3-4)	530,727,915	624,460,953	633,808,322
Added value received in transfer	0	0	0
Added amount to be distributed (5+6)	530,727,915	624,460,953	633,808,322

Distribution of added value	455,763,276	491,303,372	525,448,644
Personnel and charges	368,033,611	376,388,187	410,709,751
Taxes, fees and contributions	72,418,027	97,665,827	92,994,670
Accrued interests and rents	6,811,638	4,949,358	5,744,224
Return on Equity	8,500,000	12,300,000	16,000,000

Operational performance

With a presence across the nation and the ability to execute complex projects under the oversight of management that prioritizes safety, quality, deadlines, and outcomes, we have managed to retain a strong position in the main sectors of the primary industry, including mining and steel.

We operate on eight construction sites, with scopes that include electromechanical assembly and pipeline maintenance. Our performance stood out due to the mobilization of experienced technical teams, integrated planning and efficient logistics, ensuring deliveries in challenging environments.

A total of 7,263,182 man-hours were recorded on our own construction projects, demonstrating the scale of our operations and the commitment of our teams. This result was boosted by continuous investment in technology and infrastructure.

In 2024, fleet renewal played a key role in increasing efficiency and autonomy on the work fronts. We invested in modern, robust equipment, especially Liebherr's LTR

1130-2.1 crane - the most powerful in its category and the first in operation in Brazil - which increased safety and capacity for complex movements, optimizing deadlines and strengthening our work on construction sites.

We also finished implementing the Information Hub, an integrated corporate system that monitors KPIs on all construction sites and connects areas such as planning, supplies, HR and costs, providing more predictability and speed in decision-making.

Operational cost optimization was prioritized with the digitalization of materials control at the M.439, M.444 and M.445 construction projects, consolidated use of RQA-WEB (system developed entirely by MILPLAN's PMO department) for digital reports and greater efficiency in communication between the Company's projects and the corporate team. We also made progress in logistics, by building a maintenance shed in Canaã dos Carajás (PA), speeding up mobilizations.

Even with challenges such as economic instability and a shortage of skilled labor, we remained competitive through adaptable planning, results-focused processes and strong team engagement.



Over 7.2 million man-hours executed in 2024 reflect the strength of our operations and the commitment of our teams to high-performance deliveries.



Fleet
renewal



Implementation
of the Information Hub



Digitalization
of material control

Supply Management

GRI 2-6

MILPLAN's Procurement department has evolved with a new organizational structure and more strategic governance practices in 2024. Buyers began to act by specialty, based on accounting accounts, centralizing the acquisition of materials at the Headquarters, with support from the Northern Branch for projects in Pará. This centralization has brought gains in organization, freight and negotiation with suppliers, but has not compromised the swiftness of local purchases at the construction sites.

We introduced new management tools, such as the Contract Management module in the system and metrics to measure negotiation gains, reinforcing process control and transparency. On the M.444 and M.445 projects, with inputs supplied by the client, we implemented a digital materials control system, improving visibility and alignment with schedules.

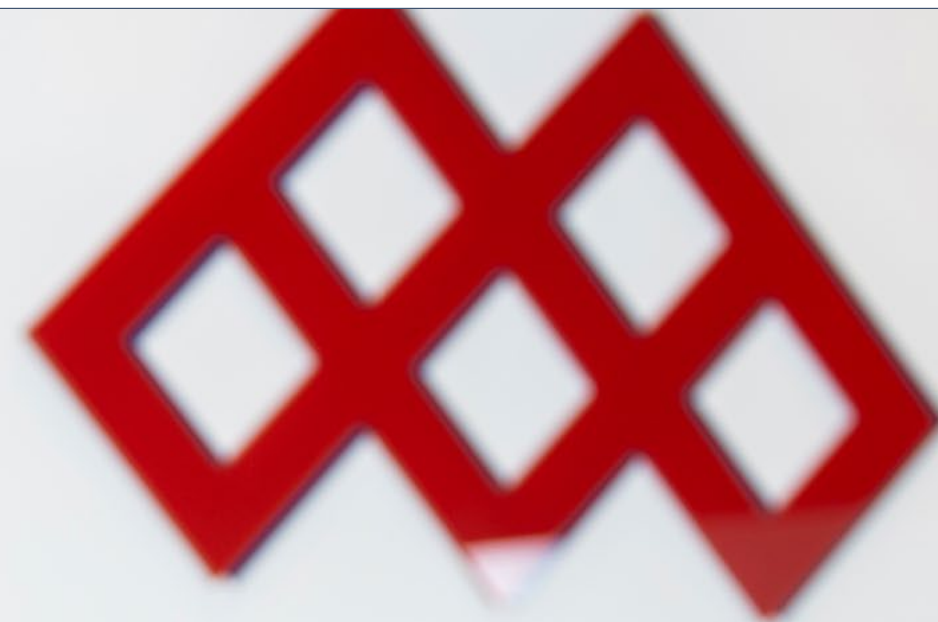
The use of BIM also stood out as a strategic tool, allowing us to visualize assembly stages, check incoming materials and identify bottlenecks and incompatibilities. With a focus on continuous improvement and integration between engineering, planning and operations, we continue to improve supply management in order to efficiently meet the specific demands of each project.



3

GOVERNANCE

Corporate governance	18
Organizational structure	19
Ethics, integrity and compliance	24



MILPLAN





Corporate governance

GRI 2-9 | 2-17

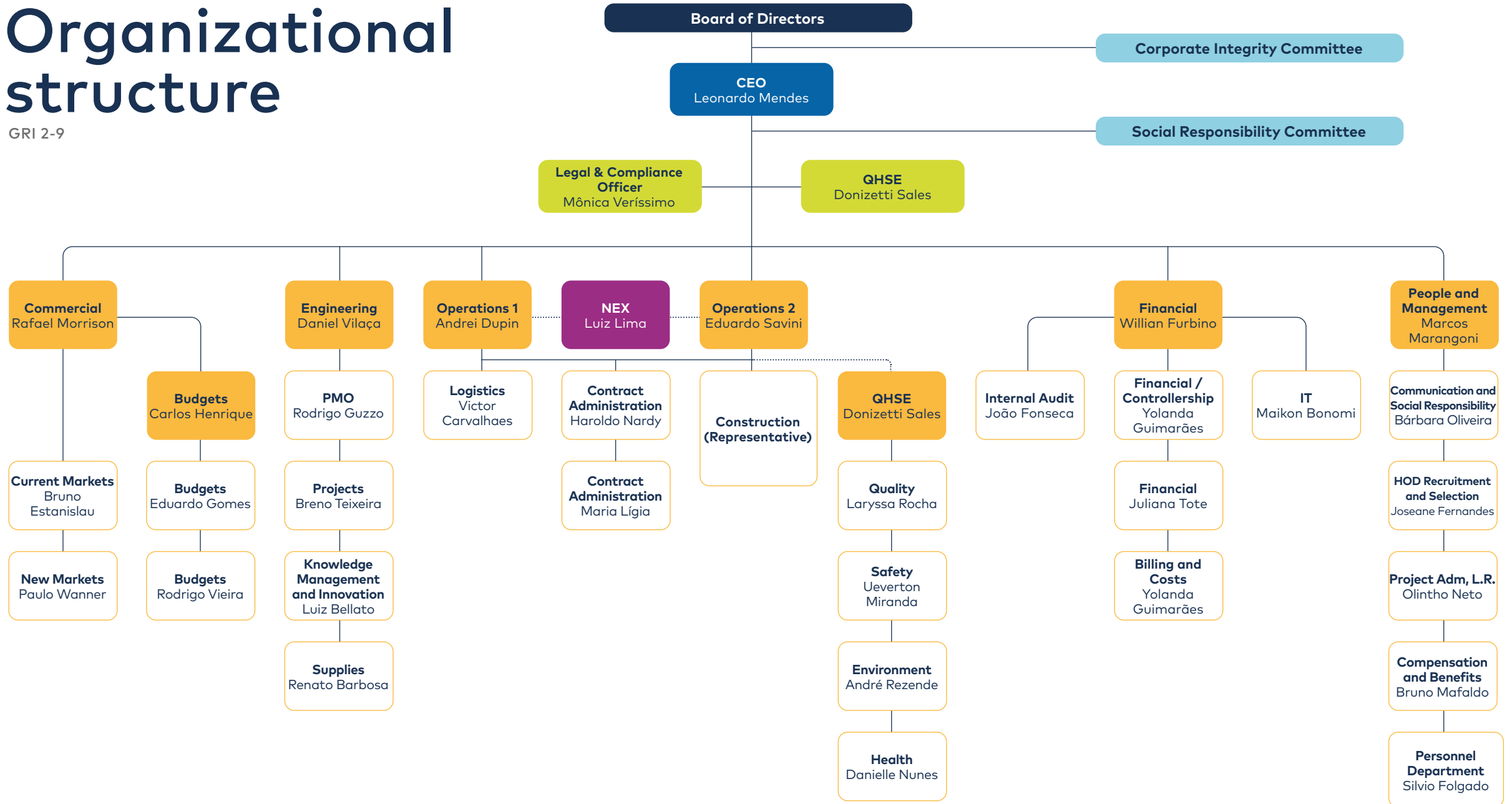
By combining the areas, qualifying decision-making, and regularly evaluating internal rules, we are strengthening our governance framework. The quarterly meetings that are still held with project teams around the nation are an example of this procedure. By keeping the strategy and corporate culture cohesive, these meetings enable us to evaluate the work's progress, set targets, and encourage learning amongst the teams.

Working together with the Dom Cabral Foundation, our partner for over a decade, remains a distinguishing feature for governance development. With the institution's support, we continue to implement strategic planning, promote development and training, and reinforce long-term management.

Moreover, in 2024, we reviewed internal policies and expanded integration between corporate and operational areas, promoting more participative management, with a focus on efficiency and transparency.

Organizational structure

GRI 2-9



Board of Directors

GRI 2-9 | 2-10 | 2-11 | 2-12| 405-1

The Board of Directors plays a pivotal role in the strategic direction of the company, with responsibilities that include defining strategies, evaluating corporate governance practices, and monitoring the company's performance and actions. It is responsible for approving and supervising the purpose, values and policies, ensuring alignment with long-term interests. Meetings are documented in minutes, ensuring transparency and a record of decisions taken.

The Board's composition is decided by the Shareholders' Meeting, at which they are elected and nominated, based on an analysis of their competencies. This process takes into account the company's context, the specific demands of the sector, the governance maturity level and market trends, as well as the technical and behavioral aspects of the nominees. Members are elected for annual terms, with the possibility of re-election.

The compensation of board members is defined by a policy approved by the senior management, based on market research and comparative studies. The packages include fixed and variable compensation and attraction bonuses.

The CEO keeps the Board abreast of strategic and operational matters, reinforcing integration and contributing to decisions in line with MILPLAN's sustainable development.

The Chairman of the Board of Directors, José Eduardo Quintella, is an independent external member and does not hold executive positions in the company.



Alencar Filho

Board member



Jose Quintella

Independent board member



Marcelo Filho

Independent board member



Germana Giannetti

Board member



Leonardo Mendes

Board member and CEO

Corporate Integrity Committee

GRI 2-9 | 2-10 | 405-1

Created in 2016, the Integrity Committee is responsible for discussing and deciding on issues related to compliance and risk management, ensuring that operations are consistent with the highest ethical and legal standards.

Its duties include analyzing complaints and suggestions received through the Ethics Channel, especially in cases of non-compliance with the Code of Conduct or situations that could pose risks to the company or its stakeholders. The Committee also updates the Corporate Risk Matrix, reinforcing its strategic role in risk prevention and mitigation.

Members are elected for annual terms.



Germana Giannetti
Committee member



Leonardo Mendes
CEO and
Committee member



Mônica Veríssimo
Committee member
and Legal and
Compliance Officer

Social Responsibility Committee

GRI 2-9 | 2-10 | 405-1

Formed in 2019, the Social Responsibility Committee is designed to guide strategies for the development and consolidation of the company's Principles of Social Responsibility and Sustainable Perpetuation.

The Committee is made up of four fixed members and three rotating members, all volunteers and unpaid, elected for two-year terms. The Committee is responsible for defining social investment strategies. Its activities are geared towards balancing the generation of value for the business while strengthening relations with communities and other stakeholders.

The Committee convenes once a month, either in person at Headquarters or via videoconference, and extraordinary meetings can be held if necessary. The matters discussed are voted on by the members and the final decision is recorded in the minutes. The minimum quorum for meetings is five members, with each member's vote equivalent to one.

Furthermore, the Committee operates based on the guidelines established in the Social Responsibility Plan, ensuring align-

ment between the actions developed and MILPLAN's institutional commitments.

These guidelines envisage a balance between generating value for the company and its relations network, with a focus on the socio-economic and environmental development of the communities where we operate, both at Headquarters and on construction sites. Initiatives must respect local cultures, promote citizen awareness through voluntary employee engagement and contribute to building a more sustainable Brazil.

Inspired by the UN's 2030 Agenda, MILPLAN has identified priority Sustainable Development Goals (SDGs) to guide its internal and external social initiatives. The Committee is also responsible for approving initiatives related to SDGs other than the priority ones, considering their importance to the local community and, when applicable, the SDGs adopted by clients. Investments are made with the company's own resources, according to the percentages defined in the Plan, as well as donations through tax incentives, respecting legal limits.



Bárbara Marques
Committee member
and Communication
and Social Responsibility
Coordinator



Donizete Sales
Committee member and
QHSE Executive Manager



Jadson Pinto
Committee member and
Purchasing analyst



Letícia Moreira
Committee member and
Financial Analyst



Olintho Neto
Human Committee
member and Resources
Coordinator



Paulo Wanner
Committee member and
Commercial Specialist

Cristiana Mendes
Committee member

Data Governance and Information Integrity

Following the Information Governance Policy, which sets procedures to support decisions and align various areas of the company, is crucial for ensuring dependable communication between the Headquarters and the construction sites.

Monitoring takes place on a weekly basis, with alerts for the swift correction of pending issues, ensuring a continuous and consistent flow. On a monthly basis, we assess performance through the Information Governance KPI, which is part of the Work Basket and measures the

punctuality and quality of project deliveries to the PMO, including documents such as Physical Progress, Billing Control and Fortnightly Monitoring Report, People and Equipment Movement Map, Commodities Control and Monthly Management Analysis (AGM).

This information governance process has strengthened the internal culture, reaching an average of 92% in the indicator, with seven projects exceeding 90%, proving the evolution of information management.

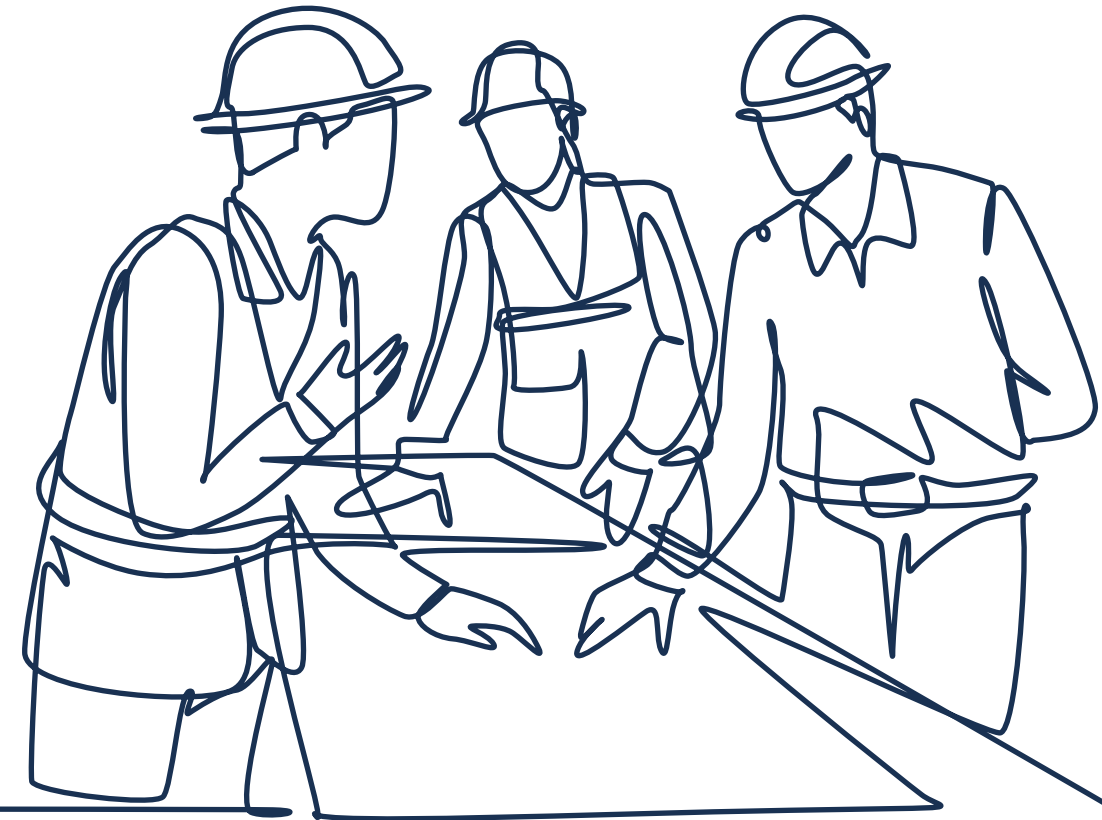
Moreover, we have implemented strict procedures to safeguard the privacy and protection of data subjects' personal data.

To guarantee data protection, we carry out periodic awareness training with our employees and keep up an ongoing process of improving our information security systems, based on regular evaluations.

WORK INSTRUCTION (WI)

In 2024, we managed 325 formal corporate documents, such as policies, procedures and manuals, which are critical to managing the company's processes. We reviewed all these documents to ensure compliance, improve transparency and eliminate obsolete ones, as well as updating the IMS coding to reflect the new classifications of the company's areas and sectors.

We implemented the decentralization of document management, making each sector responsible for maintaining its own files. To ensure an orderly transition, we held training sessions with representatives of the areas, covering the preparation, review, issue and organization of documents in the system. These actions reinforce the shared responsibility of all employees for maintaining the IMS.



Ethics, integrity and compliance

GRI 3-3 | 2-23 | 2-26 | 2-29 | 205-1 | 205-2 | 205-3

Ethics guides MILPLAN's actions and is present in relations with clients, employees, partners and communities. The guidelines are formalized in documents such as the Code of Conduct, the Consequence Management and Privacy Policies, the Social Responsibility Plan and the Integrity Committee standard, which underpin ethics and compliance practices.

Risks related to this subject are identified and monitored through the Corporate Risk Matrix, drawn up and reviewed annually by the Integrity Committee. The review takes the participation of the internal network into account and considers the lessons learned in operations, fostering a preventive approach in line with best governance practices.

INTEGRITY NETWORK

We held a webinar to launch the Integrity Network in 2024, with the aim of strengthening the ethical culture in the organization. Conducted by the Legal Manager and Compliance Officer, together with the Procurement Manager, the meeting covered the fundamentals of ethics, the role of compliance and its relevance as a competitive advantage.

Market trends and individual responsibility in promoting an environment of integrity, safety and transparency were also discussed. The Integrity Network was presented as a space for exchange and engagement, helping to consolidate practices in line with the company's values.



Ethics and conduct

MILPLAN's **Code of Conduct** governs the actions of all the company's employees. Its aim is to ensure that our activities are conducted legally, ethically and responsibly. Its content describes the actions expected from the different stakeholders with whom we interact, such as shareholders, customers, suppliers, service providers, communities, unions and governments, always seeking balanced and transparent relationships.

The Code's guidelines are part of all employees' contracts, with no exceptions. When they are hired, everyone receives access to the document, takes part in specific training and signs an acknowledgement and commitment form. **Apart from the Code, other policies - such as the Privacy Policy, the Social Responsibility Plan and the Integrity Committee standard - are also made available on MILPLAN's internal portal and website, broadening understanding of individual and collective responsibilities.**

The leadership, particularly the Integrity Committee members, play a pivotal role in spreading this culture. Everyone undergoes training on the Code of Conduct, reinforcing the importance of setting an example and acting proactively to promote an environment of integrity, transparency and respect.

Such care for ethical conduct also extends to our suppliers and service providers from the outset. Contracts include specific clauses on ethics, human rights and an-



ti-corruption, and the Code of Conduct is made available as a reference to guide best practices and ensure alignment with MILPLAN's values.

The content of the training sessions on the Code of Conduct also encompasses guidelines for preventing and fighting corruption. These topics are reinforced with all the company's stakeholders, including governance members, employees and partners. MILPLAN

respects, complies with and fully follows the Anti-Corruption Law (Law No. 12.846/13) and expects the same commitment from everyone.

Moreover, 100% of operations are assessed for risks related to corruption, based on the Risk Matrix. In 2024, no confirmed cases of corruption were recorded, a result which reinforces the effectiveness of our integrity system.

Integrity & compliance

GRI 2-16 | 2-25 | 2-26 | 2-29

Ethics Reporting Line

We interact with integrity at all levels of the organization, supported by mechanisms for active listening, accountability and ethical practice. One of the main tools is the Ethics Reporting Line, which is available in a confidential, secure and independent manner to employees, suppliers and other stakeholders, allowing them to register complaints, questions and reports about misconduct or non-compliance with the Code of Conduct and other company policies.



Operated by a specialized third-party company;



Ensures the confidentiality, impartiality and proper handling of the complaints received;



Available via website, phone and app;



Announcement via MILPLAN's website, banners, internal newsletters, campaigns and newsletters.

1

Outsourced company takes reports and forwards them to the Integrity Committee

2

Each case is analyzed and investigators are assigned



The Committee also holds monthly meetings focused on the continuous improvement of the integrity mechanism, analyzing indicators, reviewing processes and making adjustments whenever necessary.

3

Investigations are carried out

4

Finally, it is decided what measures should be taken

Its purpose is to receive reports from all interested parties about possible unethical conduct. Reports follow a structured flow, based on internal procedures covering the areas responsible for investigating and forwarding the appropriate actions.

In addition to the Ethics Reporting Line, we have an internal ombudsman channel, **Zé MIL** — a space for

submitting suggestions, requesting information, and registering complaints. The listening process is carried out by the People and Management team, which is also responsible for analyzing the reports and forwarding responses through internal communication channels. Reports can be made anonymously and all complaints are treated with secrecy and confidentiality.

ACCESS THE ETHICS REPORTING LINE

Website: www.contatoseguro.com.br/MILPLAN

Telephone: 0800 517 0001

Contato Seguro app

Calls are toll-free, regardless of the region of the country, and ombudsmen are available 24 hours a day, seven days a week, all year round.

Consequence Management



We have a Consequence Management Code, providing criteria and procedures to be taken in cases of misconduct, including non-compliance with the Code of Conduct, the Golden Rules or other company guidelines.

The main goal is to ensure that we behave ethically, safely and with integrity, fostering a work environment that is fair, transparent and aligned with our values.

Guidelines apply to all employees and guide the implementation of disciplinary measures based on principles such as individuality, proportionality, severity and transparency. Measures may range from a written warning to dismissal for just cause, always taking into account the seriousness of the situation and the evidence found.

We also learn from each case, carrying out corrective measures to avoid new violations and cor-

recting faults identified in any area. We also run an ongoing communication and training plan to reinforce the importance of the rules and ensure that everyone is aligned.

The Policy, together with the Integrity Program, gathers essential guidelines and practices to maintain ethical conduct with all our stakeholders. We believe that integrity is built every day, which is why we encourage our employees to contribute ideas and suggestions that help improve this process on an ongoing basis.

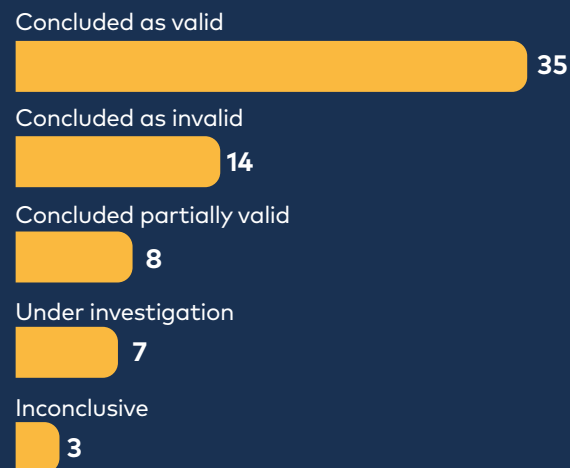


SERVICE INDICATORS - 2024

GRI 2-16

67
reports
received

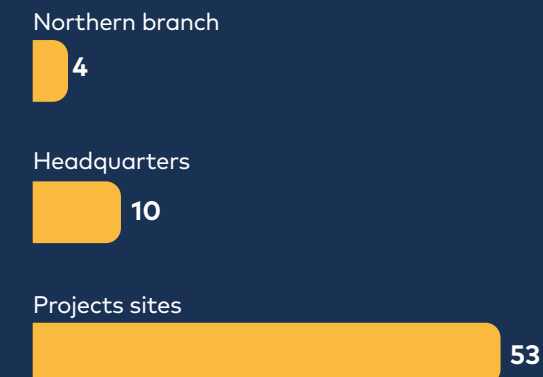
Status



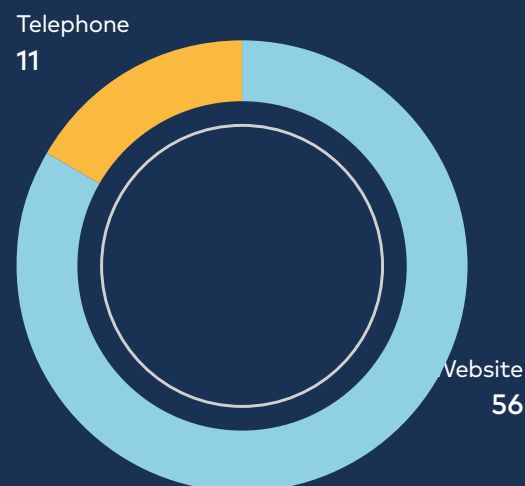
Average time from release date to completion



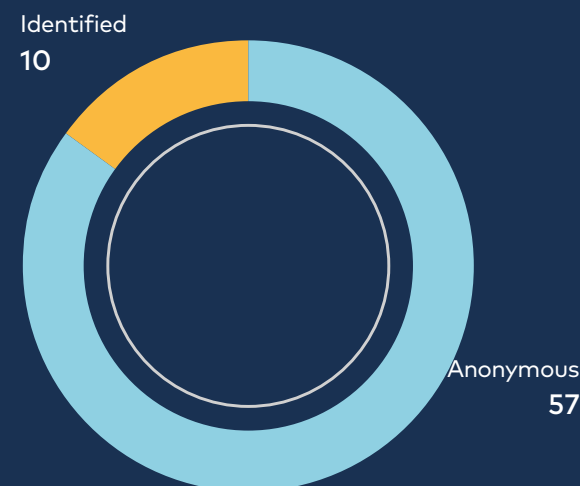
Event location



Report origin



Complainant identified him/herself



Actions Taken/Outcomes*



* In December 2024, there were five complaints pending.

4

ESG AGENDA

ESG strategy	30
ESG commitments	31
Materiality study	33



ESG strategy

GRI 2-22

Since 2023, when the ESG area was created under the Commercial Department, MILPLAN has strengthened sustainability internally and increased its visibility. In 2024, we moved forward by integrating the ESG agenda into the commercial area, aligning actions with the demands of clients and sectors.

Following a diagnosis, we evaluated existing initiatives and identified improvements, the basis for developing the **ESG Policy**. As a responsible company, we focus on feasible commitments and excellent deliveries, which strengthens customer trust and becomes a competitive advantage, consolidating a close and collaborative relationship in the search for more sustainable action.



We value an approach that respects and strengthens our network of relationships, balancing human, technological, and organizational interests to produce sustainable outcomes in the economic and financial fields.



ESG commitments

GRI 2-24

ESG Policy

In 2024, we made progress on sustainability with the diagnosis for creating MILPLAN's ESG Policy, which defines environmental, social and governance guidelines in line with our purpose. The policy, resulting from listening and analysis, reinforces our commitment to feasible and transparent practices.

The internal diagnosis revealed greater maturity than expected, allowing for a realistic approach aligned with the company's trajectory and stage in the ESG agenda.

The Commercial Division actively led the process of creating the policy alongside the Communication and Social Responsibility department, collaborating with other departments to ensure that the document authentically reflects MILPLAN's values and is clear, accessible and subject to continuous evolution. The diagnosis focused on developing a practical tool, aligned with our reality, that guides decisions and engages the various areas effectively.

Next, we will structure the process of defining ESG indicators, with measurement criteria, monitoring frequency and responsible parties, validating with those involved and planning the next steps.

Sustainable practices that have already been incorporated will be standardized and quantified, while we will move forward with validating the policy with relationship networks, strengthening internal communication and encouraging continuous collaboration to improve it, leading to approval by senior management.



UPDATING THE NON-CONFORMITY MANAGEMENT SYSTEM

We improved the tool for monitoring non-conformities in the IMS, integrating the external supplier portal with the employee portal. This ensured traceability, organization and greater transparency, allowing external parties to follow up on actions quickly.

The process gained a follow-up map to monitor the progress of non-conformities and a root cause study tool to identify their real origins, facilitating effective preventive measures. This modernization has cut out manual steps, increased the reliability of information and improved control of the quality of the services and products delivered.

Integrated Management System

In the last cycle, we restructured the Integrated Management System (IMS), making it more participatory and aligned with the sectors' routines. Previously centralized in the Quality department, each sector now manages its own documents and processes, with technical support when needed.

This change improved the autonomy of the teams and clarified responsibilities. To ensure an orderly transition, we held training sessions on reviewing and issuing documents and using the electronic system (GED). We also reviewed all the documents, with the responsible areas and support from Quality, ensuring up-to-date and objective information.

The restructuring of the IMS resulted in the external recertification audit, which confirmed MILPLAN's compliance with ISO 9001:2015 (Quality), ISO 14001:2015 (Environmental) and ISO 45001:2018 (Occupational Health and Safety) standards.

The audit, carried out on a sample basis, assessed several areas and activities at MILPLAN through interviews, field observations, document review and analysis of operations, ensuring a complete overview of the IMS' effectiveness.

The process was a hybrid: part in person at the Headquarters in Belo Horizonte (MG), focused on man-

agement and support, and visits to projects M.441, in Mariana (MG), and M.439, in Ouro Branco (MG), to check the practical application of the routines.

The recommendation for recertification confirms the company's commitment to continuous improvement, quality, environmental responsibility and team safety.

WORLD QUALITY DAY

On November 14, we celebrate World Quality Day, with a view to reinforcing the importance of quality in products, services and processes.

The theme of the Chartered Quality Institute (CQI) was **"Quality: from compliance to performance"**, highlighting the evolution of quality practices, which seek not only compliance with standards, but also excellence and continuous improvement.

In line with this theme, we had the honor of welcoming an auditor with over 25 years' experience. He addressed the evolution of quality through the following themes: from standardization to continuous improvement; from efficiency to effectiveness; and from ISO 9001:1994 to ISO 9001:2025.



Materiality study

GRI 3-1 | 3-2

In 2023, we conducted the process of defining materiality¹ for the year, as a basis for preparing MILPLAN's Sustainability Report. The goal was to identify the most relevant topics for the company and its relationship network, considering the actual and potential impacts of our activities.

The consultation involved 55 employees from different areas and hierarchical levels, and we also carried out a sector analysis to map out the main challenges and trends. After consolidating this information, we organized and grouped the material topics into blocks related to the ESG pillars (environmental, social and governance) and classified them according to their strategic relevance.

The prioritized topics are represented in the infographic to the side, which visually illustrates the topics that guide our work and the structuring of the report.

¹ The materiality matrix did not include consortia, which account for 31% of the company's revenue.



**Occupational
Health and
Safety**



**Attraction and
Retention of
Talent**



Human Rights



**Community
Relations**



**Economic
Performance**



**Ethics and
Compliance**



Decarbonization



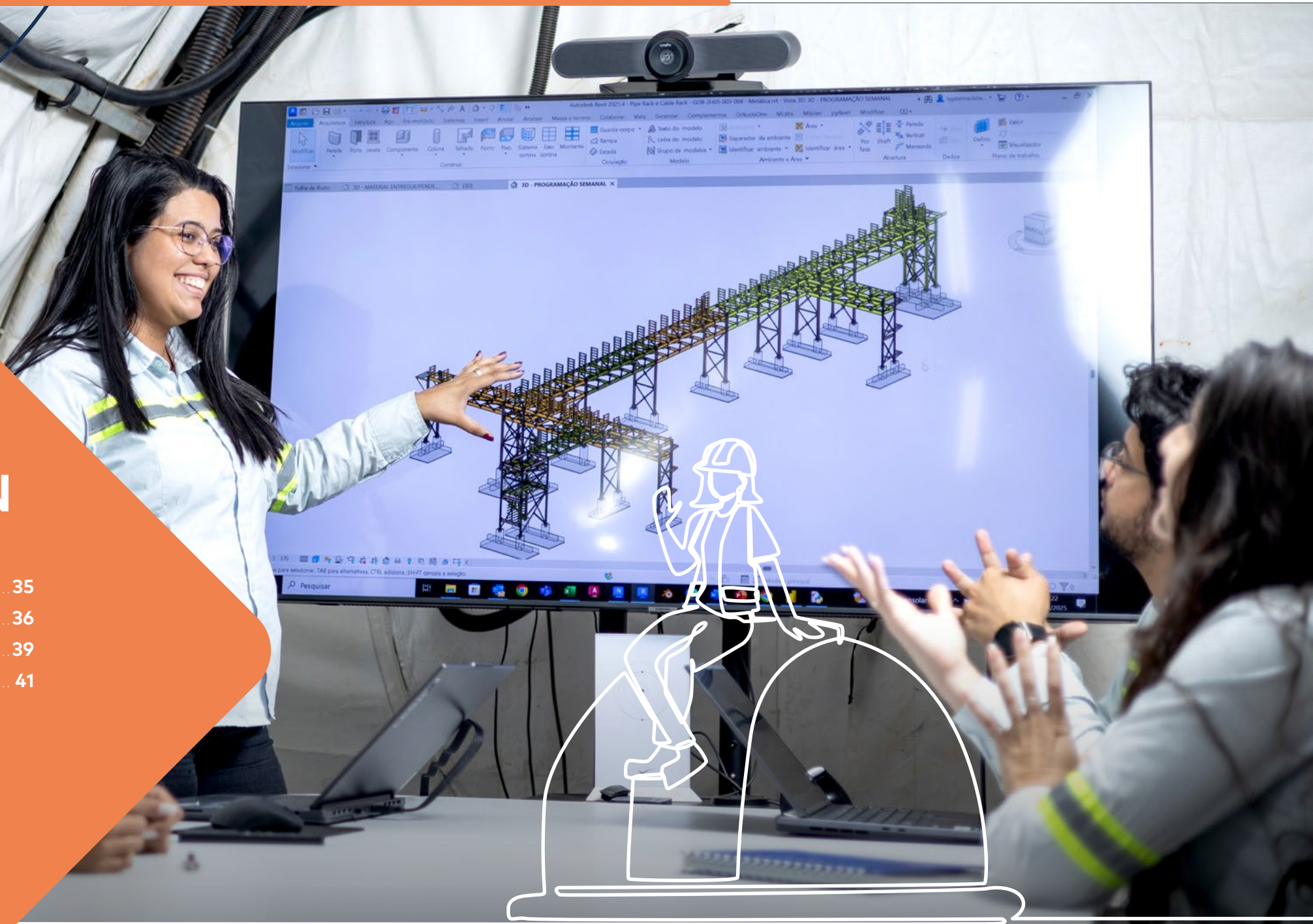
**Environmental
Management**



5

INNOVATION

Drive for innovation	35
Methodologies and processes	36
Technology and digitalization	39
Customer-focused innovation	41



Drive for innovation

Our innovation journey has been steadily strengthened in recent years and, in 2024, reached a new level with the consolidation of the PMO, setting its management as one of MILPLAN's strategic pillars.

MILPLAN's Project Management Office has been structured into two strategic sectors: **Projects and Construction Governance** and **Knowledge Management and Innovation**. While the former is dedicated to standardizing, planning and monitoring works based on best practices and management methodologies, the latter promotes a continuous improvement culture, spreads organizational learning and manages innovation initiatives. These initiatives include the implementation of Advanced Work Packaging (AWP) and Building Information Modeling (BIM) methodologies, which have transformed the way we plan and execute our projects, as well as consolidating the tools of the Lean Construction philosophy.

This structure also includes project sponsors, or MILPLAN Business Partners (MBPs) - experienced professionals who act as strategic mentors - who align project objectives with the company's goals. The PMO is also responsible for centralizing data in the Information Hub, through Business Intelligence (BI) management, allowing for faster and more informed decisions, with greater predictability and control of deliveries, as well as making strategic decisions based on data.

In recent years, we have made significant progress in the area, such as:



- Structuring and standardizing project processes in line with PMI and market best practices, tailored to our reality;



- Continuous training and development of employees, especially production and planning teams, strengthening the project culture with a focus on digital methodologies and tools;



- Acting as a link between areas and sectors of the company, promoting strategic alignment and collaboration in multidisciplinary projects;



- Assigning project management a central role in prioritizing strategic initiatives;



- Continuous monitoring of the project portfolio, with a focus on analyzing budgetary performance, adherence to deadlines, generation of added value, consolidation of lessons learned and identification of opportunities for innovation;



- Definition of committees, clear roles and responsibilities, strengthening portfolio governance and its alignment with organizational objectives;



- Greater predictability and control in project execution, with centralized data and information, contributing to agile decision-making.

As the culture of innovation advances, the Simplification Committee has also been created, with the aim of prioritizing efficiency in the execution of processes and procedures. The initiative seeks to encourage the use of innovative solutions to simplify activities and foster collaboration between areas.

Methodologies and process

In 2024, the Lean Project was one of MILPLAN's strategic initiatives, focused on consolidating the core routines of Lean Construction. In this second year of the project, the scope was expanded to include the Pull Planning technique and the analysis of waste based on the recording of hours. By the year-end, we had achieved 95% adherence to the proposed practices.

The PMO also structured all the procedures related to the basic framework of the Lean methodology. As a result, a Last Planner System (LPS) plan was issued, which consolidates the six Work Instructions (WIs) and all the Standard

Forms (SFs) required for projects to apply the concepts of the approach.

Based on this material, we started to monitor the evidence of the implementation of the planned routines with the project teams on a monthly basis. And every three months, during the quarterly construction meeting, the three projects with the greatest adherence are recognized and highlighted. This approach has strengthened collaborative planning, team coordination and process control, with direct impacts on productivity and intelligent use of resources.



The use of unified methodologies at MILPLAN has been driven by the pursuit of operational excellence and efficiency.



LEAN - LPS (Last Planner System)



Daily Stand-ups

Focus: Continuous communication and daily operational alignment.

Purpose: (1) Carried out on the work fronts with the participation of the teams, (2) Ensure that everyone knows their responsibilities and the progress of activities, (3) Facilitate problem identification, promote engagement and focus on goals.



Visual management board

Focus: Transparency in planning and visual control of progress.

Purpose: (1) Used directly on construction sites to monitor activities, pending issues and solutions, (2) Allows clear visualization of the planning and progress of activities, (3) Enables effective communication and swift decision-making.



6WLA - Six Week Look Ahead

Focus: Short-term planning and anticipation.

Purpose: (1) Routine carried out to forecast activities for the next six weeks, (2) Identifies possible obstacles before they affect execution, (3) Minimizes delays and reduces waste.



Control Tower Meeting

Focus: Alignment between sectors and performance monitoring.

Purpose: (1) Weekly meeting between sector leaders and the project manager, (2) Discussion of performance indicators and definition of corrective actions, (3) Promotes systemic vision and collaboration between areas.



Pull Planning

Focus: Collaborative planning guided by actual project demand.

Purpose: (1) Definition of activities required for the planned deliveries, (2) Activities are "pulled" from the final deliveries and the capacity of the teams, (3) Encourages collective commitment to the schedule and results.



Advanced Work Packaging (AWP)

Focus: Efficient organization of work based on division of activities.

Purpose: (1) Structuring of site planning with well-defined work packages, (2) Anticipation of engineering and supply constraints made possible by the AWP's sequencing logic, (3) Alignment of planning, supply and execution to guarantee productive fronts freed up in the field.



Building Information Modeling (BIM)

Focus: Adherence to construction sequencing and reduction of variability.

Purpose: (1) Support for collaborative planning through visualization of feasible fronts, (2) Alignment between model and execution plan, reinforcing commitment to what is possible to build, (3) Visual analysis of interferences and support for defining work packages coordinated with engineering and procurement.

LESSONS LEARNED SYSTEM

We have made significant progress in structuring and sharing lessons learned. The number of registrations leapt from five in 2023 to 38 last year - a growth of 760%, totaling 60 lessons learned registered, together with a notable maturing in the reports' content.

Lessons learned are recorded in a dedicated system, with a formalized process for registration, approval and consultation. The PMO is responsible for disseminating the approved lessons at the quarterly site meetings, increasing the visibility of best practices and reinforcing the PMO's role in disseminating knowledge.

As part of the strategy to strengthen this culture, we have included a specific chapter in the Work Opening Meetings (RAO in Portuguese) for the presentation of lessons learned relevant to the new project. The initiative contributes to the transfer of knowledge between teams, avoiding the repetition of mistakes, stimulating opportunities and promoting continuous improvement in our operations.



Technology and digitalization

In 2024, technology was at the heart of MILPLAN's innovation strategy, with advances in automation, digitization and the use of data. The creation of the Business Intelligence (BI) cell under the PMO improved data governance, standardizing information and streamlining decisions through 35 corporate dashboards.

On construction sites, technologies such as semi-automatic welding (site M.444) and the use of BIM have enhanced productivity, quality and integration throughout the project cycle.

Participation in international trade fairs has broadened access to innovations, reinforcing the commitment to advanced solutions, including future applications of Artificial Intelligence to optimize processes and operational efficiency.



At MILPLAN, technology has been integrated as a lever for decision-making, control, and productivity gains.

TECHNOLOGICAL INNOVATION

We have secured our innovation activities on the basis of the incentives provided by the Lei do Bem (Law 11.196/2005). In 2024, three strategic projects were framed:

- Lean Construction
- Mobilizar
- TECSOLDA



INFORMATION HUB:

PROMOTING ACCESS TO INFORMATION

Developed by the PMO at the close of 2024 and officially launched at the beginning of 2025, the Information Hub is intended to centralize access to all of MILPLAN's corporate dashboards. The initiative arose from the realization that, despite the company's advances in data management, many employees were still unaware of the fact that the dashboards available existed or that they could be used in practice.

By creating the Hub, we sought to increase the visibility of these tools and make it easier to consult already consolidated information, setting up a Single Source of Truth. All the dashboards available are fed by 100% integrated databases, which reduces unnecessary requests and provides greater autonomy for the teams. The measure also reinforces our journey towards a data-driven culture.

Although still recent, the initiative is already showing positive signs, with data being consolidated almost automatically and information from areas such as HR, billing, logistics, quality and SMS being centralized. This new format increases the power of analysis and decision-making for leaders, allowing them to monitor performance trends and anticipate impacts for customers and the company itself. The predictability brought about by the Hub strengthens planning and contributes to more rapid decisions in line with MILPLAN's strategic objectives.



MOBILIZAR PROJECT

In 2024, MILPLAN consolidated the Mobilize Project, a strategic initiative aimed at standardizing, automating and improving the initial stages of construction mobilization. The project is designed to ensure greater efficiency, control and safety in these processes by defining procedures, standardizing documents and operational routines, as well as implementing critical processes that ensure compliance with the sector's best practices.

Customer-focused innovation

Innovation at MILPLAN has been aligned with active listening and meeting clients' needs, focusing on customized solutions developed in partnership. We have a transparent relationship, reporting daily on progress and risks, which increases the predictability and efficiency of projects.

The structured collection of feedback, through surveys and meetings, allows us to adjust processes quickly and drive improvements in line with client expectations, strengthening partnerships, making projects more assertive and ensuring a continuous cycle of improvement.





INNOVATION WITH BIM IN OURO BRANCO (MG)

The M.444 Electromechanical Assembly project at the Ouro Branco Plant (MG) marked a breakthrough in MILPLAN's digital transformation by being the first project to apply BIM in a structured way. The use of BIM included 3D modeling, coordination, interference detection and 4D planning.

Apart from the modeling, we developed a solid methodology using Revit and Navisworks, with customized standards, stamps and parametric families, ensuring greater efficiency, control and integration in the planning, execution and monitoring of the project.

The weekly work schedule is now directly visible, with clearly defined stages linked to the timetable. Each discipline has been given its own stamp, which identifies the current week, the work packages (CWA and CWP) and the reference projects, ensuring alignment between the model and planning. A color map incorporated into the stamp visually shows the progress of the services, making it easier to understand progress.

Moreover, contractual measurement has been automated via the model, linking each delivery to the executive project, bulletin and discipline, which ensures traceability, precision and transparency, reducing the risk of errors and rework.

3D modeling is used to anticipate restrictions in the material supply, such as in the detailing of pipe supports, identifying lines served, inconsistencies and the need for new projects.

The model can be accessed by any employee, even in the field, via QR codes that offer interactive visualization, precise measurements in virtual reality and first-person navigation, with no need for specialized software. Integration with the Autodesk Construction Cloud (ACC) platform speeds up the control of pending issues, making it possible to record problems with photos directly on site and monitor their resolution.

We have also adopted the AWP (Advanced Work Packaging) concept to organize construction into packages from planning to execution, ensuring greater coordination of the workflow.

4D visualization, which integrates the 3D model and schedule, has become vital for anticipating challenges and optimizing the sequence of works, reinforced by the superimposition of drone imagery to better contextualize the terrain.

We have developed our own tools to streamline and standardize modeling, such as automation that converts hundreds of files and extracts tables automatically - for example, we processed 280 projects in less than three hours in the initial phase.

We also created GLB models, which are lighter and more dynamic, used in presentations to facilitate understanding and decision-making. We have also automated the registration of elements such as screws and connections, increasing the accuracy and organization of the data.

This integrated approach has resulted in gains in predictability, technical precision, a reduction in rework and greater transparency in monitoring the work, aligning MILPLAN with the principles of digital construction and the demands of technologically advanced clients.

The experience is being documented as a pilot project to create the company's corporate BIM standards, covering modeling guidelines, interoperability, deliverables, information governance and integration with engineering and construction. This technical basis will allow the use of BIM to be scaled up in future projects, boosting operational gains and strengthening innovation as a competitive advantage.



INNOVATION WITH BIM IN CANAÃ DOS CARAJÁS (PA)

On project M.443, the assembly of the secondary crusher for the Tailings Concentrate Pipelines, we adopted solutions that increased operational efficiency and reduced maintenance risks. In response to the client's request to carry out the assembly in a single scheduled stoppage, we revised the original methodology and proposed grouping the four components of the transfer house into a single module.

This approach made it possible to anticipate stages and carry out the assembly of the metal, mechanical and electrical structures simultaneously, reducing time on site and the risks involved.

The solution adopted for the M.443 project involved the use of two large cranes (200t and 250t) and an axle line to move the grouped structure for around 800 meters, leading to significant gains in weight and productivity during pre-assembly and scheduled stops.

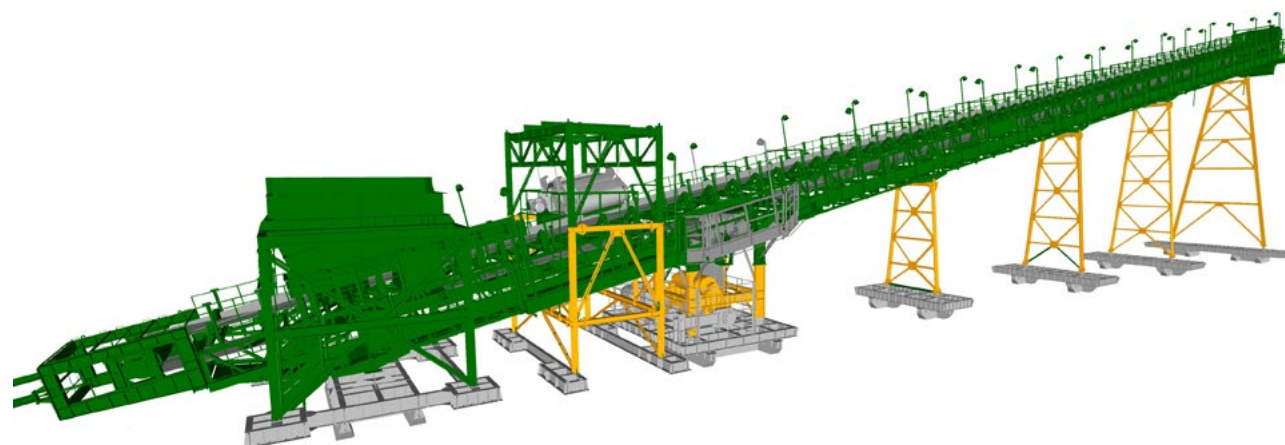
The 3D model made it possible to visualize the construction stages synchronized with the schedule, facilitating weekly programming, up-to-date reports and alignment with the client. Direct communication helped to identify bottlenecks quickly and act preventively.

Controlling materials in real time ensured smooth execution, avoiding delays due to lack of supplies. Visual management, with daily updates and the use of collaborative tools, strengthened remote monitoring and rapid decision-making. Team involvement was increased by daily check-in meetings to adjust deviations.

During stoppages, a control matrix classified activities as in progress, completed, delayed or critical, allowing for effective analysis and solutions.

We implemented a formal process to control on-demand services, avoiding out-of-scope activities without planning, ensuring traceability, predictability and focus on project objectives.

Integration between planning, engineering, field and client represented a breakthrough in MILPLAN's use of BIM, demonstrating our ability to adapt solutions to specific needs, combining innovation, safety and efficiency in complex construction projects. This approach made it possible to meet the schedule and the client's requirements safely and efficiently.



Semi-automatic welding and training with the TecSolda Program

MILPLAN has excelled in innovation and adding value to clients, as exemplified by the development of the Welding Process Specifications (WPS) for HYDRO. Before implementation, welding had high repair rates, compromising efficiency and quality. MILPLAN's customized solution, which incorporated semi-automatic welding technology, was applied to HYDRO's new pipeline projects, which transport bauxite from Paragominas to the Alunorte refinery in Barcarena (PA).

The development of the new process involved a rigorous training and professional qualification program, in which welders received specific training for each EPS and were evaluated by test samples, ensuring compliance with the required technical standards.

The funds generated by the delivery to the client allowed MILPLAN to invest in the qualification of its professionals, extending this benefit to all its construction sites.



Technical workshops were held to raise awareness of innovation and highlight gains in productivity and safety.

Following its success, the semi-automatic welding process was expanded to other projects and clients. The main benefits

were greater operational efficiency, reduced repairs and increased safety, with less exposure to risks. These results reinforced customer satisfaction and consolidated a safer and more productive working environment, reinforcing MILPLAN's commitment to excellence.

Measurement and Control Equipment Management

We have developed and implemented integrated software for the control and traceability of measuring equipment used on construction sites, including calibration and distribution to employees. The system digitalizes calibration certificates, making them easier to access and organize.

An important innovation is the generation of QR Code labels applied to the equipment, allowing users, customers and inspectors to instantly access the certificates via their cell phones, ensuring authenticity and compliance with no manual processes.

This solution underlines our commitment to quality, compliance and innovation, improving equipment control and offering transparency to clients and auditors.

6

ENVIRONMENT

Environmental Management.....	47
Emissions.....	50
Energy.....	53
Water.....	55
Biodiversity.....	57
Waste and Materials.....	57



Environmental Management

GRI 3-3

At MILPLAN, environmental management is integrated into the Integrated Management System (IMS) and guides all stages of activities, focusing on preventive measures and alignment with client requirements. We hold Daily Safety Dialogues (DDS) on environmental topics at all construction sites and run centralized communication campaigns, replicated across projects to strengthen a unified and conscious environmental culture.

In 2024, we promoted environmental awareness campaigns in some communities surrounding certain projects, with the aim of encouraging sustainable practices and integrating the social and environmental pillars.



WORLD WATER DAY

In celebration of World Water Day, we held an educational event at the São Raimundo Elementary School in Ouro Branco (MG), near the M.439 Project. The activity included interactive dynamics designed to raise awareness about water conservation, highlighting the importance of this vital resource for life and the environment. The initiative engaged students, teachers and employees, strengthening our sustainability work and our relationship with local communities.



ARBOR DAY (HEADQUARTERS)

On September 21, in celebration of Arbor Day, we held a symbolic event at MILPLAN's headquarters in Belo Horizonte (MG). Employees gathered to plant ten saplings in the company's courtyard, raising awareness of the importance of trees and caring for the environment. The action helped to strengthen environmental awareness and appreciation of natural resources among our employees.



TREE DAY (PROJECTS)

To commemorate Arbor Day, we organized environmental awareness initiatives at all our construction sites. At the M.440 Project, in Canaã dos Carajás (PA), we planted saplings with children from the local community, encouraging them to take care of the environment.

At Project M.445, in Ouro Preto (MG), we organized an educational talk at a local school, attended by MILPLAN employees, to reflect on the importance of trees and environmental preservation.

Throughout 2024, we carried out **775 training sessions** focused on the Environment, totaling **27,495 man-hours** of training. These initiatives reinforce the culture of environmental conservation and sustainability.

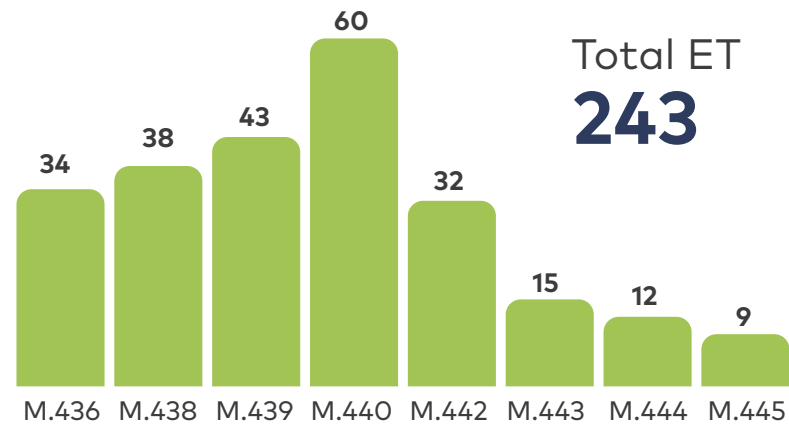


We also monitored a number of environmental indicators:

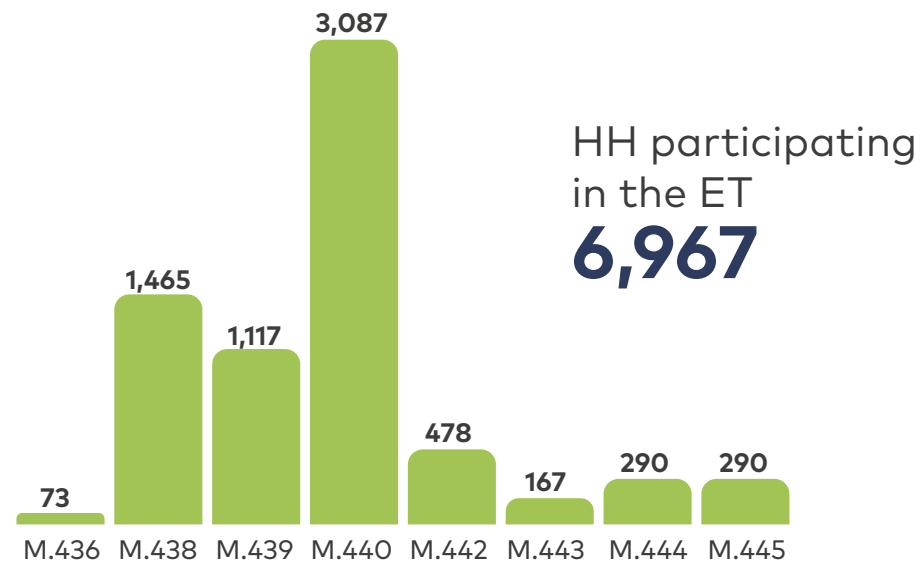
- Scope 1 emissions;
- Scope 2 emissions;
- Scope 3 emissions;
- Fuel consumption;
- Solid waste;
- Effluents;
- Water consumption;
- Environmental dialogues;
- Environmental training;
- Paper savings;
- Environmental incidents.

ENVIRONMENTAL TALKS

Environmental talks by project

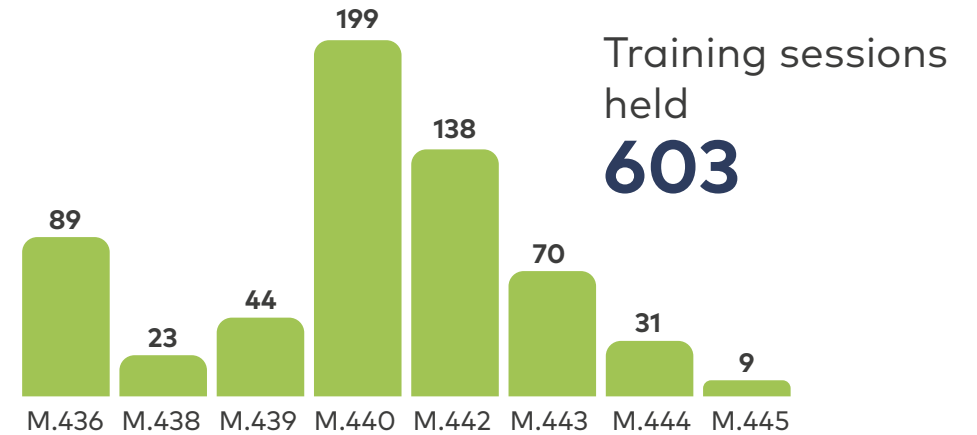


HH of participants per project

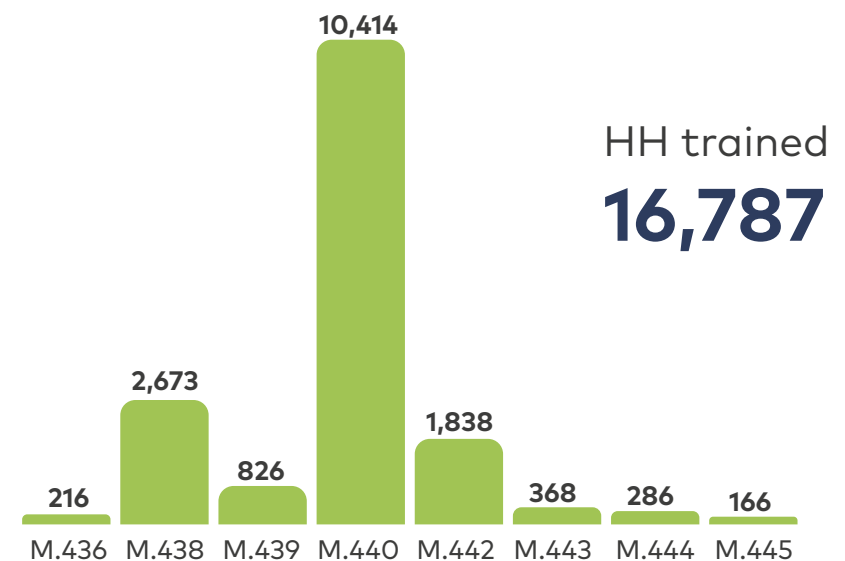


ENVIRONMENTAL TRAINING

Training per project



HH trained per project



Emissions

GRI 305-1 | 305-2 | 305-3 | 305-4 | 305-5

Emissions management has made great strides in recent years, with the expansion of monitoring actions and internal training. As a continuation of the process started in 2023, the construction sites continued to systematically send fuel consumption data to the Headquarters Environment team, which remains responsible for consolidating, controlling and reporting the information.

In 2024, we trained several employees to fill in the Carbon Emission Inventory Worksheet according to the GHG Protocol methodology, covering Scopes 1 and 2 and, for the first time, Scope 3. Apart from the Environment team, the logistics teams at the Headquarters and construction sites were also trained, contributing directly to the mapping of emissions related to upstream transportation and distribution.

These efforts made it possible to expand the database available for analysis. As a result, we estimate a total reduction of 746.34 tons of CO₂ equivalent, considering both the direct reduction in emissions and the offsets made.

In Scope 1, the reduction was 347.65 tons, driven mainly by the use of ethanol to replace gasoline in around 85% of the projects. Initiatives to reduce paper consumption in internal processes also contributed. In Scope 2, the drop was 1.67 tons, due to the use of solar panels at the company's headquarters. In Scope 3, 390.02 tons were reduced by sending waste generated on construction sites for recycling (a practice carried out in the previous year but with no monitoring of the total volume).

The calculations followed the GHG Protocol methodology, including the gases O₂, CH₄, N₂O, HFCs, PFCs, SF₆ and NF₃.



1,267.2
tCO₂e
intensity of
Greenhouse
Gas (GHG)
emissions¹

¹ The emissions intensity is calculated from the total emissions divided by the number of MILPLAN projects.

GHG INVENTORY (tCO₂e)

Scope 1

Gross emissions	4,474.15
Biogenic emissions	767.45
Total	5,241.60

Scope 2

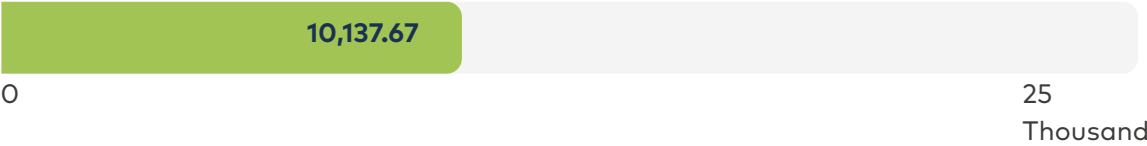
Localization-based approach	10.16
Total	10.16

Scope 3

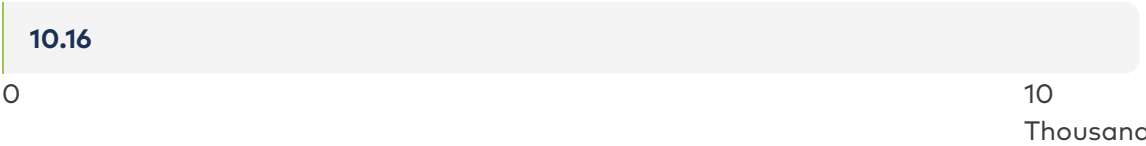
Gross emissions	4,885.91
Biogenic emissions	0.00
Total	4,885.91

Total	10,137.67
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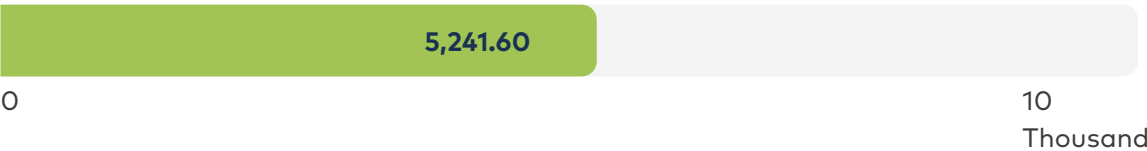
Total emission of CO₂ (tCO₂e)



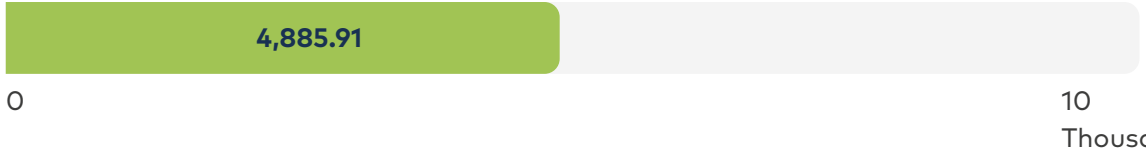
Total emission of CO₂ (tCO₂e) - Scope 2



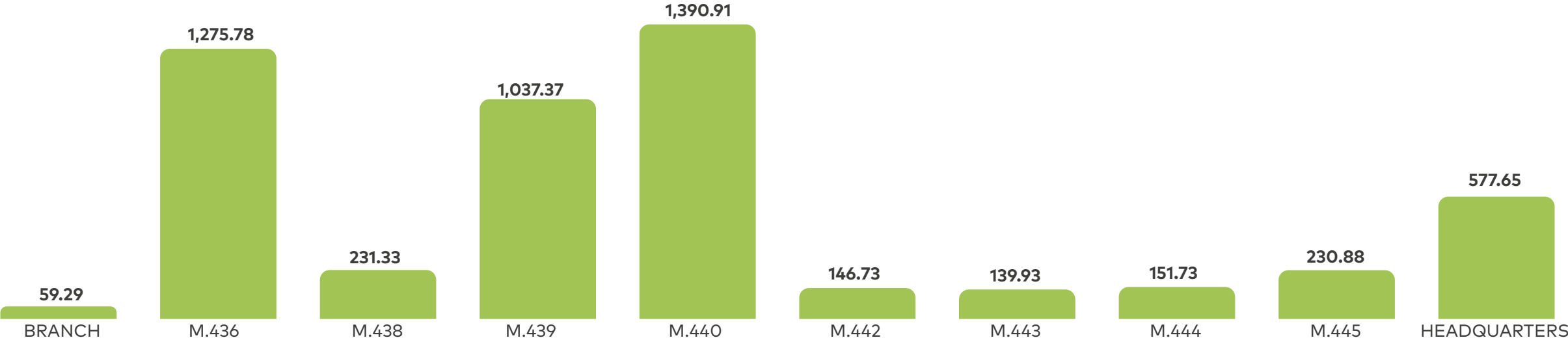
Total emission of CO₂ (tCO₂e) - Scope 1



Total emission of CO₂ (tCO₂e) - Scope 3



Emission of CO₂ (tCO₂ eqv.) by project





Decarbonization

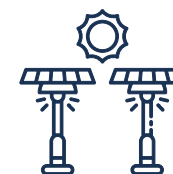
GRI 3-3

During 2024, we developed a number of initiatives aimed at encouraging the reduction of carbon emissions in our operations, including:



Encouraging the digitalization of processes

We replaced paper-intensive flows with digital solutions, which resulted in a reduction of 2.98 tons of CO₂.



Use of photovoltaics

The solar energy used at the Headquarters and in construction lighting towers helped avoid the emission of 82.72 tons of CO₂.



Fuel replacement

We encourage the use of ethanol instead of gasoline, avoiding the emission of 263.63 tons of CO₂.



Home office

The adoption of remote working for part of the employees at the Headquarters has avoided the emission of 6.32 tons of CO₂.

Energy

GRI 302-1 | 302-3 | 302-4

On the construction sites where we operate, we follow the energy use policies defined by our clients, adopting responsible practices aimed at reducing consumption and preventing waste. Until 2023, energy consumption on projects - such as the administrative offices on construction sites - was not taken into account in our controls, since the energy used on work fronts is the client's responsibility. In 2024, we started to include this data in our internal monitoring - Headquarters, North Branch and construction site administrative offices - broadening our view of energy use and strengthening our commitment to efficiency and sustainability.



2,023.33 MWh of energy intensity¹ and a reduction of 42.6 MWh in energy consumption with the injection of energy through the solar panels at the Headquarters.

¹ Energy intensity was calculated based on the total amount of energy divided by the number of projects.

² The conversions were performed following the GHG Protocol – Stationary Combustion Tool v⁴.1.

TOTAL ENERGY CONSUMPTION WITHIN THE ORGANIZATION (MWH)

Consumption from non-renewable fuels

Gasoline	898.02
Diesel	14,332.92
Total	15,230.94

Consumption from renewable fuels

Ethanol	891.74
Total	891.74

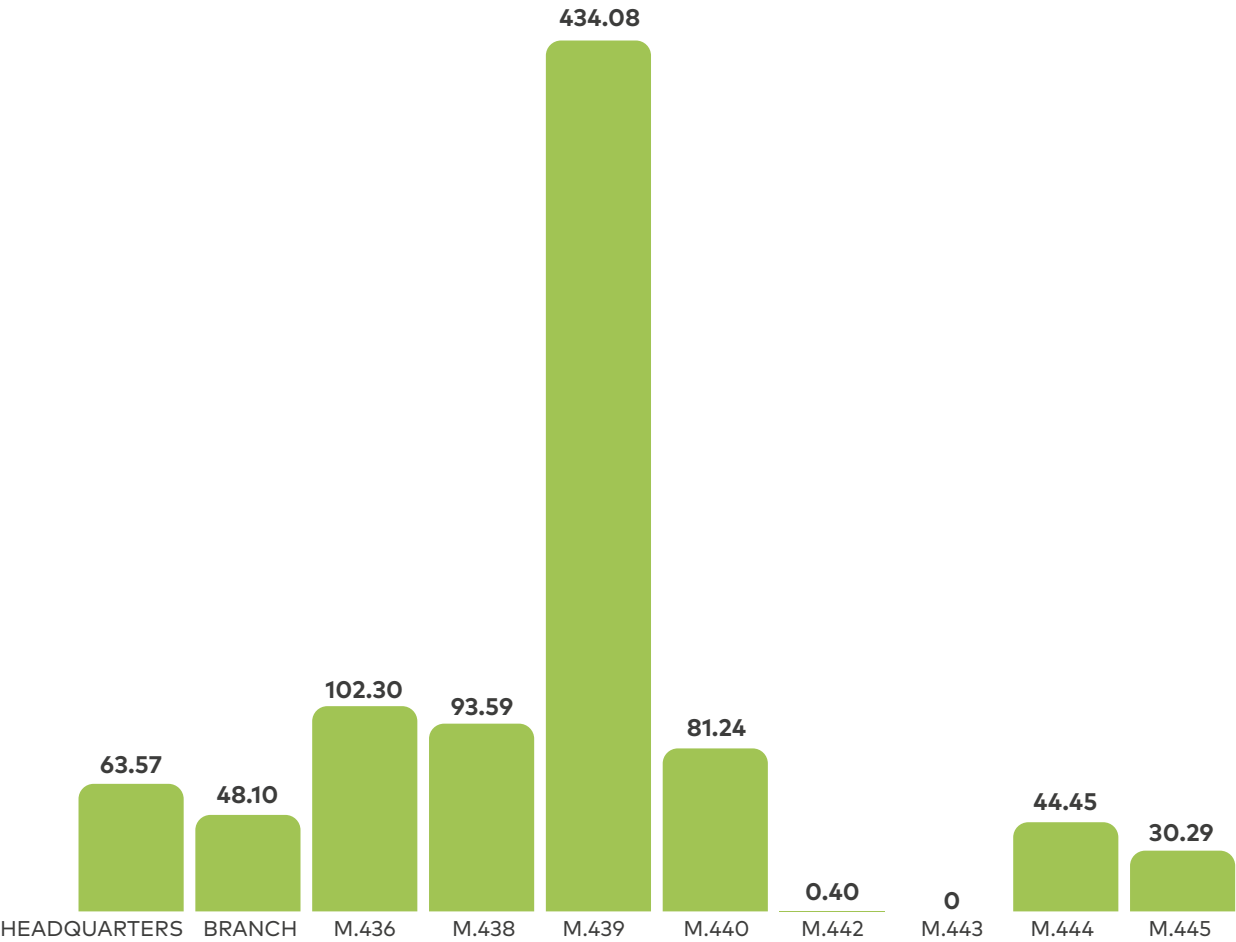
Electricity

Electricity	221.61
Total	221.61

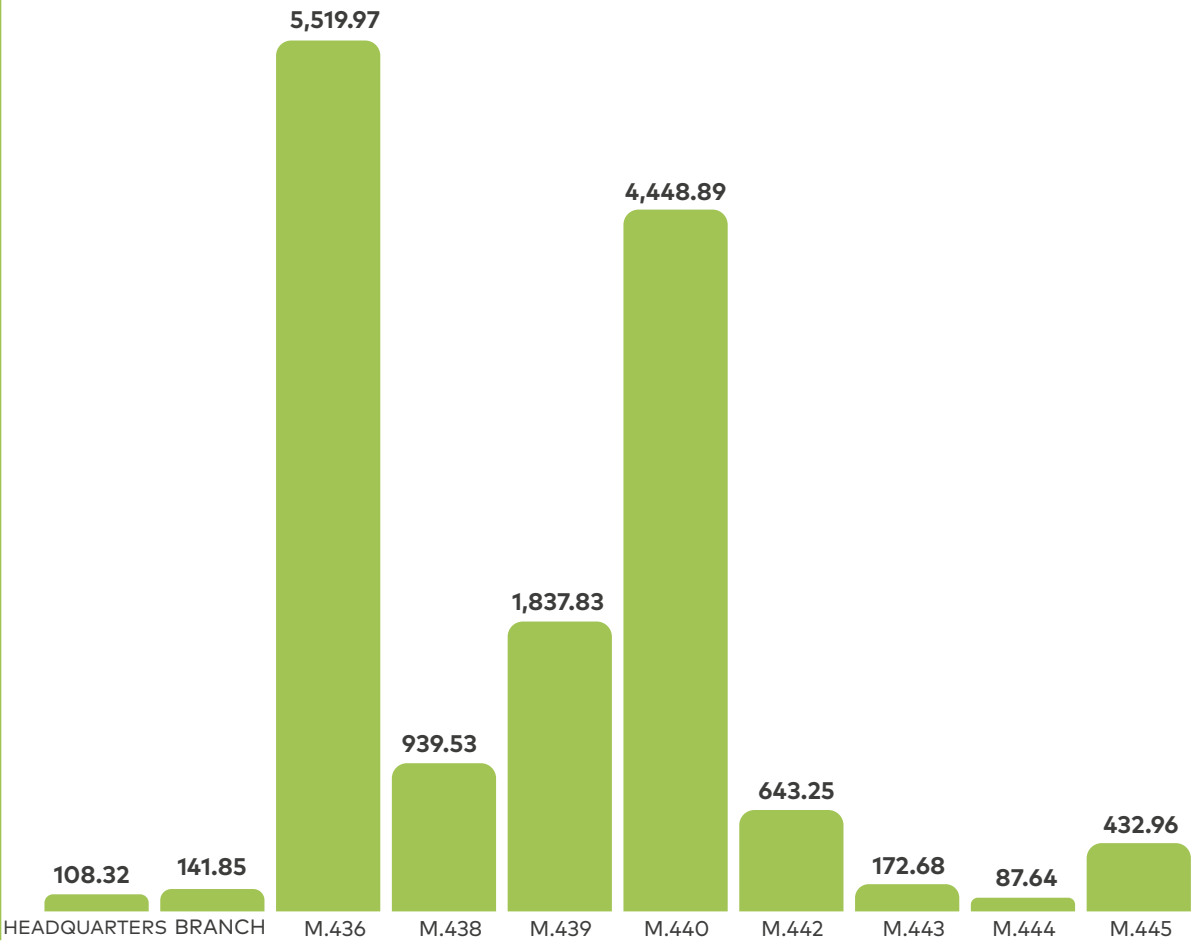
Total	16,344.29
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Gasoline (MWh)



Diesel (MWh)



Water

GRI 303-1 | 303-3

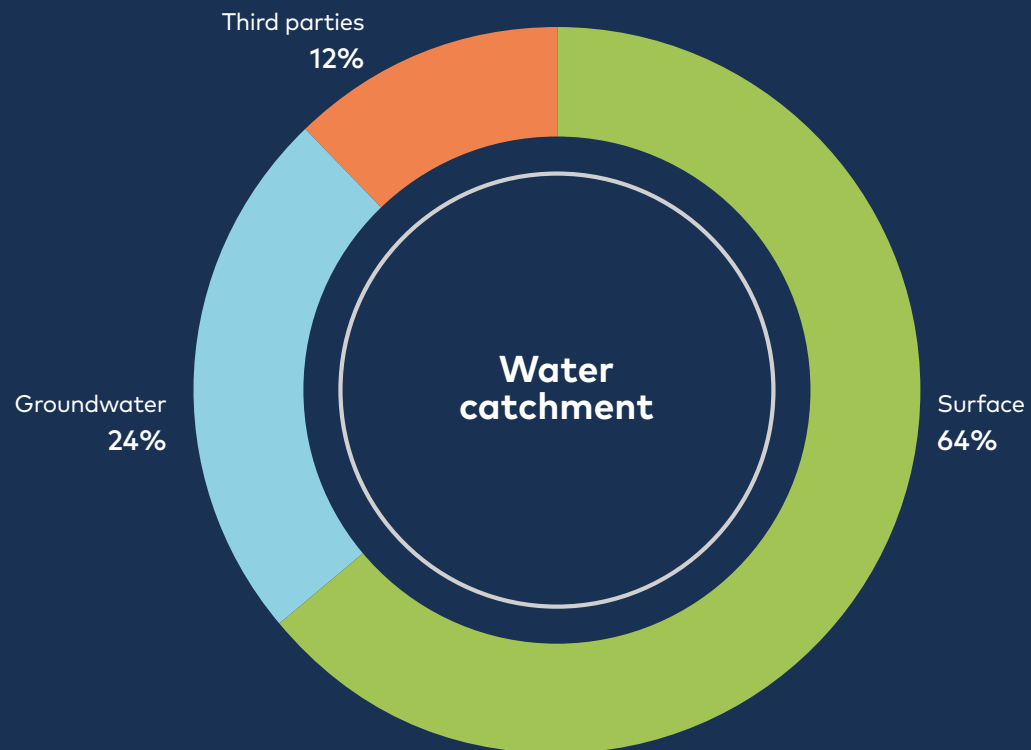
We embrace responsible practices for the use and preservation of water resources, promoting efficient and sustainable water management at all our units, including the headquarters, the branch office and the construction sites in operation.

Water is used mainly for human consumption, washing vehicles and work areas, as well as wetting roads - the latter being mainly responsible for the volume consumed on construction sites, which is crucial for mitigating dust that can reach neighboring communities.

The choice of source varies according to the features and needs of each project. In 2024, we used surface sources, underground sources and third-party supplies. It is important to note that, until 2023, water extraction data was not monitored; monitoring began in 2024, evolving the way we manage this resource.

Catchment is assessed on a monthly basis using an indicator that compiles the data provided by the Environmental technical teams at each construction site. This information is checked and compiled by the Headquarters team and then made available on the Information Hub. Measurements are made based on data controlled directly at the construction sites, ensuring greater precision and traceability.

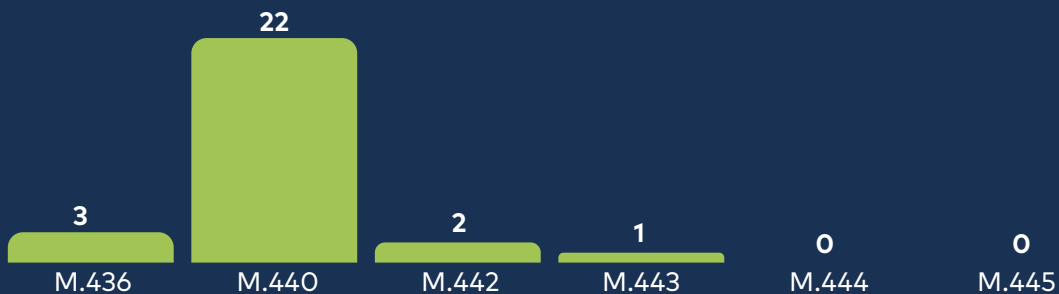
Apart from technical management, we also carry out awareness campaigns to promote the conscious use of water. The campaigns are aimed at employees, clients and neighboring communities, with local initiatives and communications on our social networks. In most projects, water consumption is managed by the clients themselves, since MILPLAN operates within the industrial plants. Even so, we seek to contribute to the preservation of water resources through monitoring, dialog and awareness-raising.



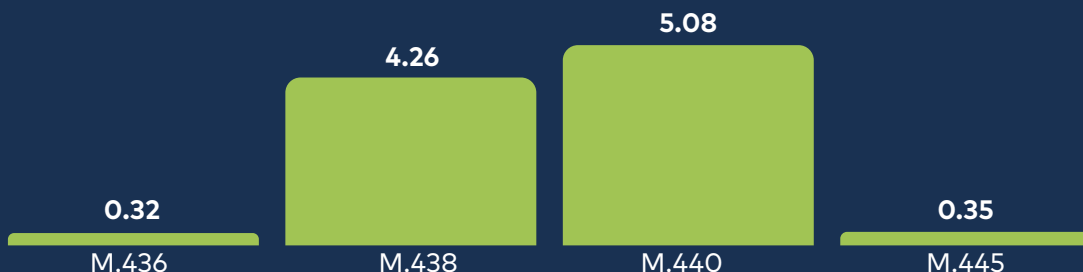
WATER CATCHMENT (ML)

Third parties	5.20
Surface	27.51
Groundwater	10.01
Total	42.72

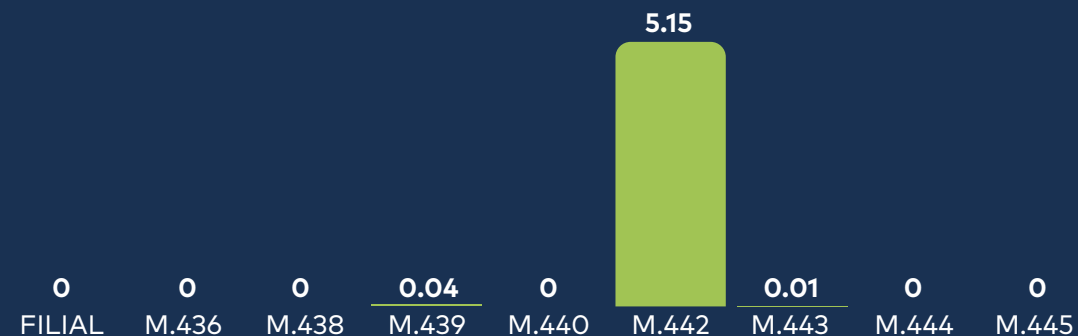
Surface water catchment (ML) per project



Groundwater catchment (ML) per project



Third-party water catchment (ML) per project



We have been operating the Effluent Treatment Plant (ETP) in Conceição do Mato Dentro (MG) since 2023, installed at the accommodation on MG-010, KM 180.

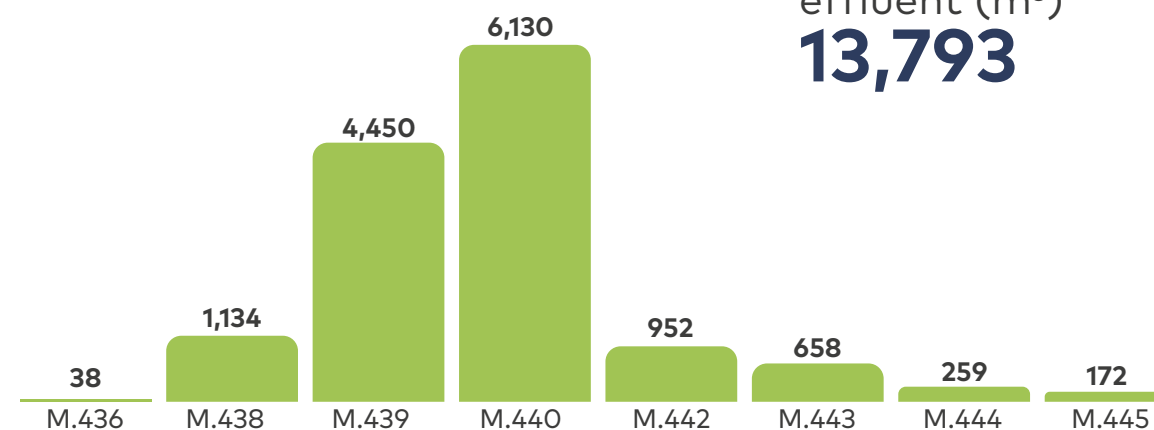
The structure treats the sewage generated in toilets, sinks and tank areas, promoting the proper disposal of the liquid waste generated by the site's activities.

The treatment system produces two main products:

- **Treated water**, which is reused to wet down indoor roads, reducing the demand for drinking water and contributing to dust control.
- **Stabilized sludge**, classified as inert, which is collected and disposed of by a specialized company with a valid environmental license.

The operation of the ETP is one of our actions to promote sustainability on construction sites, prioritizing reuse, reducing impacts and respecting environmental requirements.

Treated effluents (m³) by project



Biodiversity

The conservation of biodiversity continues to be a concern in MILPLAN's operations. In 2024, we continued to act in accordance with the guidelines set by our clients and reinforced our internal practices aimed at preventing impacts in sensitive areas. We continued to take care in areas of greater risk, such as rural areas close to construction sites, where the presence of wild fauna is common.

Campaign on venomous animals

In 2024, MILPLAN carried out a campaign on venomous animals with the aim of making our employees more aware of how to act when they come across these species in the workplace. The campaign provides guidance on the correct procedures to be followed, ensuring employee safety and also the preservation of species, fostering a harmonious and safe coexistence for all.



Materials and waste

GRI 301-1 | 306-1 | 306-2 | 306-3 | 306-4 | 306-5

In our operations, we use materials such as sand¹, gravel² and wood³, which are obtained from external suppliers according to each project's specific needs. These materials are managed in an integrated manner, with the Procurement and Logistics teams aligned with the teams on each site.

The amount of materials used in each project is reported monthly to the Environment team at the construction sites, which in turn consolidates the information and sends the data to the people responsible for the area at the Headquarters. This monitoring and reporting practice was implemented in 2024, since, in 2023, material consumption data was not reported to Headquarters. This data collection covers all of MILPLAN's construction sites, excluding the Headquarters and branch.

We generate several types of waste during our operations, including wood, paper, plastic, construction waste, scrap metal in general, among others. Most of

this waste is sent for recycling directly by the client, who is responsible for the final destination, while the quantity generated is controlled internally on the construction sites.

The Environment technical team monitors waste generation by means of the Environmental Aspects and Impacts Survey (LAIA), identifying and managing the associated environmental impacts, both at the construction sites and at the Headquarters and branch.

During 2024, we carried out an awareness program at the Headquarters, which monitored the maturity of waste sorting by all our employees, with random weekly inspections and scores for each sector. In this way, we made everyone aware of the importance of correctly sorting the waste generated and how much this impacts the environment, potentially polluting the soil, groundwater, rivers and seas.

¹ Non-renewable materials

² Renewable material

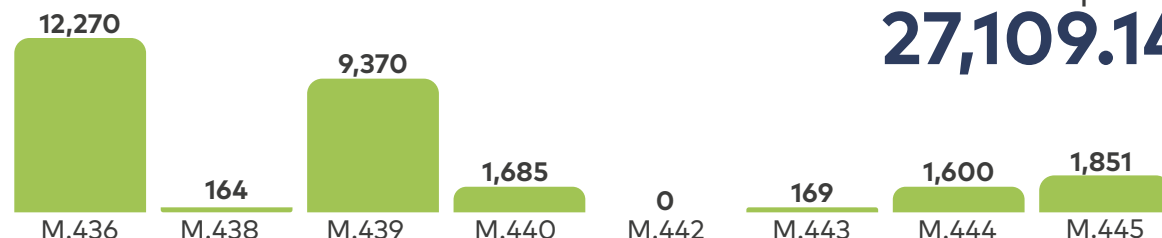
Monitoring is carried out using internal manifests or weighing tickets, which help to control the quantity generated and sent to the client's internal storage. This data is reported monthly to the corporate team, feeding the company's BI indicators. We also use software to ensure compliance with all legal requirements relating to waste management, which is monitored by an environmental technical team.

Environmental impact control is carried out at all stages of waste generation and storage, and we employ a variety of actions to minimize environmental impacts. These practices are spread through a Manual of Best Reuse Practices, shared with all construction sites, with the aim of promoting more sustainable solutions throughout the process.

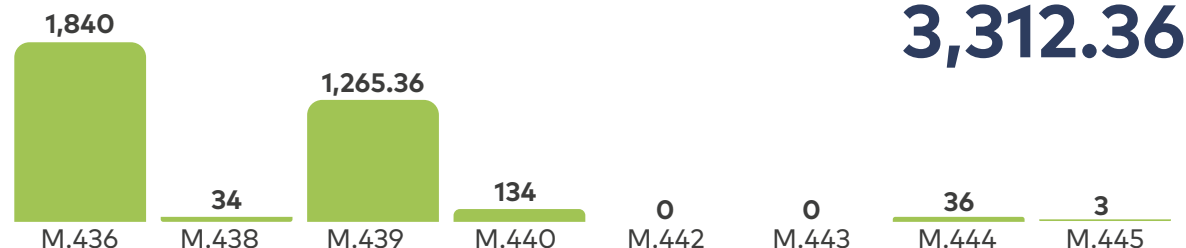


We have incorporated a selective sorting procedure into all of our projects to lessen our environmental impact, and we have conducted awareness campaigns emphasizing appropriate waste sorting and responsible consumption.

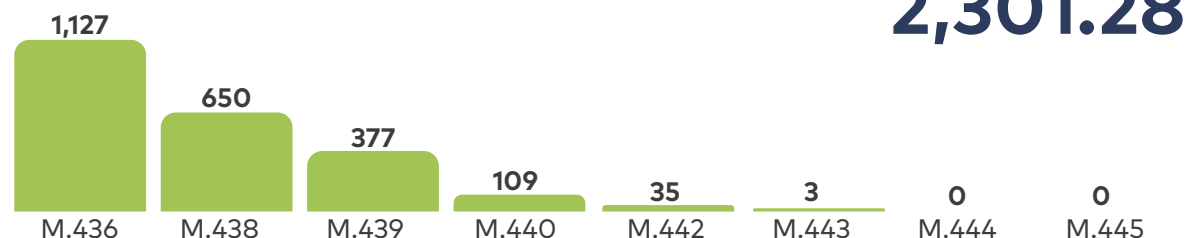
Wood consumption (m3) per project



Sand consumption (m3) per project



Gravel consumption (m3) per project



WASTE GENERATED (T)

Hazardous waste

Hazardous (material containing oil, grease, rags, paint, etc.)	131.23
--	--------

Total 131.23

Non-hazardous

Organic	11.73
Paper and cardboard	30.54
Plastic	51.68
Debris	1,096.66
Não reciclável	138.65
Rubber	26.20
Wood	432.50
Copper	7.51
Metal	133.69
Scrap	352.93

Total 2,282.09

Total 2,413.32

WASTE NOT SENT FOR FINAL DISPOSAL (T)

Non-hazardous waste diverted from disposal

Paper and cardboard	30.54
Plastic	51.68
Copper	7.51
Scrap	1,096.66
Metal	133.69

Total 1,320.08

WASTE SENT FOR FINAL DISPOSAL (T)

Hazardous waste sent to final disposal

Hazardous	131.23
-----------	--------

Total 131.23

Non-hazardous waste sent for final disposal

Organic	11.73
Non-recyclable	138.65
Rubber	26.20
Wood	432.50
Debris	352.93

Total 962.01

Total 1,093.24

Also in 2024, we were invited to take part in the recording of Checklist Fácil's success story, in recognition of the strategic use of the tool to boost sustainable practices in the company. We developed a sustainability indicator that allows us to monitor and measure environmental gains such as a reduction in paper consumption, water savings and a reduction in carbon emissions. We also expanded the use of the tool, which generated positive environmental impacts, contributing to the preservation of natural resources.

68,552
Sheets of paper saved

6.86
Trees spared

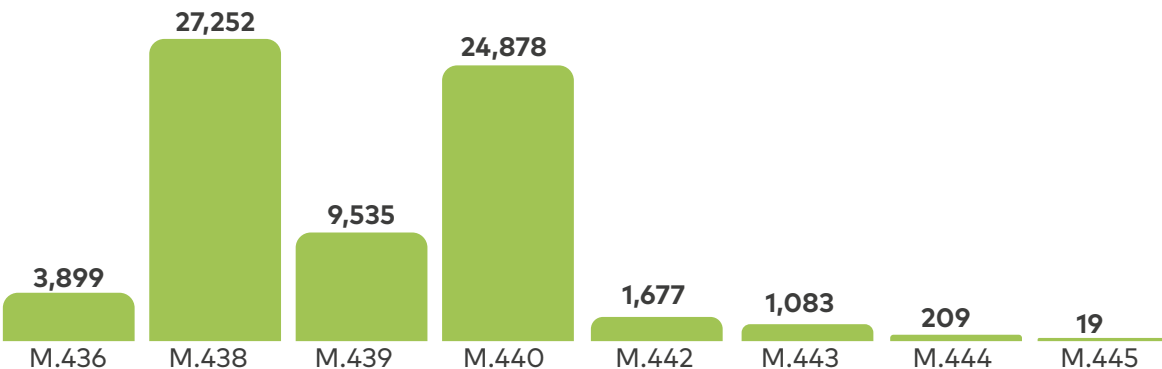
0.59
CO2 not emitted (t)

BRL 3,496
Value saved

685,520
Water savings (L)

27,632
Quantity applied

Sheets saved per project



7

OUR PEOPLE

Employees	61
Operational Health and Safety	74
Human Rights	80
Community relations	82





Employees

GRI 2-7

#SOMOSMILPLAN

We continually invest in the professional and personal development of our teams, fostering a safe, inclusive and motivating work environment, because we know that the well-being of each employee has a direct impact on the excellence of the results delivered.

We offer training programs, health and well-being initiatives, as well as policies that encourage diversity and inclusion. In doing so, we reinforce our commitment to the people who build the company's present and future together with us.

In 2024, MILPLAN had a total of 6,909 employees who joined the company throughout the year. At the peak, we reached 3,991 professionals simultaneously.



Once again, MILPLAN has been awarded the Great Place to Work seal. We were also recognized by the FIA with the Incredible Places to Work Award.



Total number of employees

GRI 2-7



6,909

Own employees



626

WOMEN

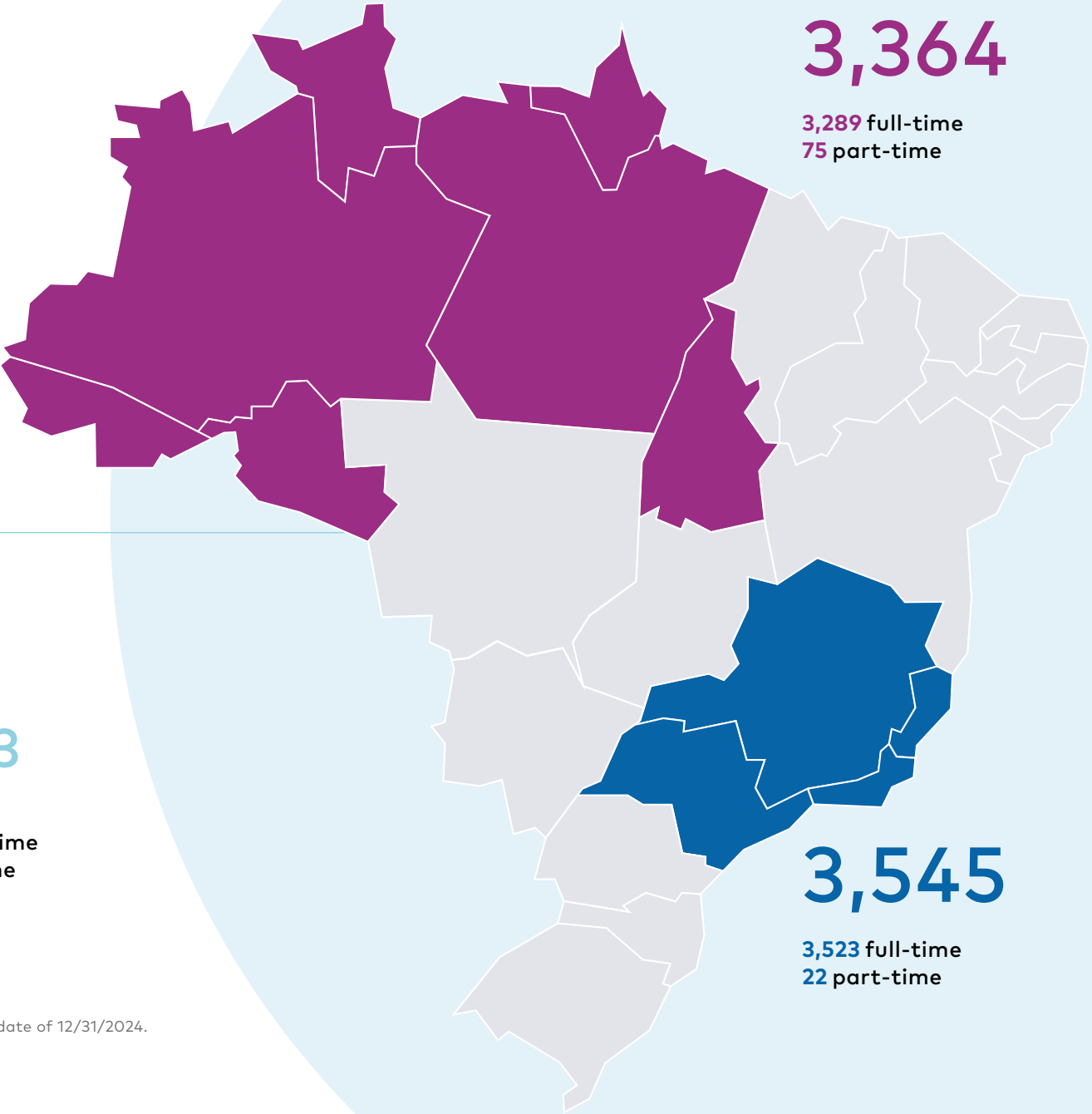
582 full-time
44 part-time



6,283

MEN

6,230 full-time
53 part-time



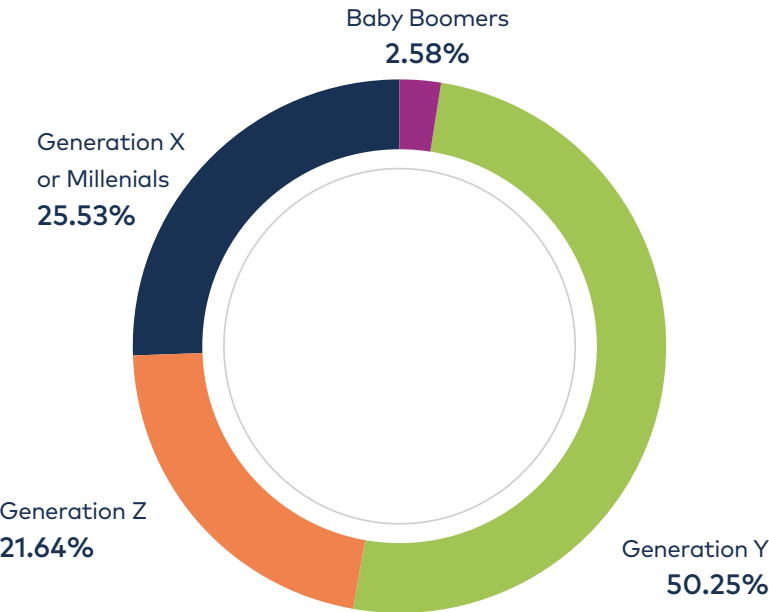
Notes:

- 1- There are 12 trainees and 85 young apprentices working part-time.
- 2- The information on employees was taken from the ERP system's Records Report, with a base date of 12/31/2024.

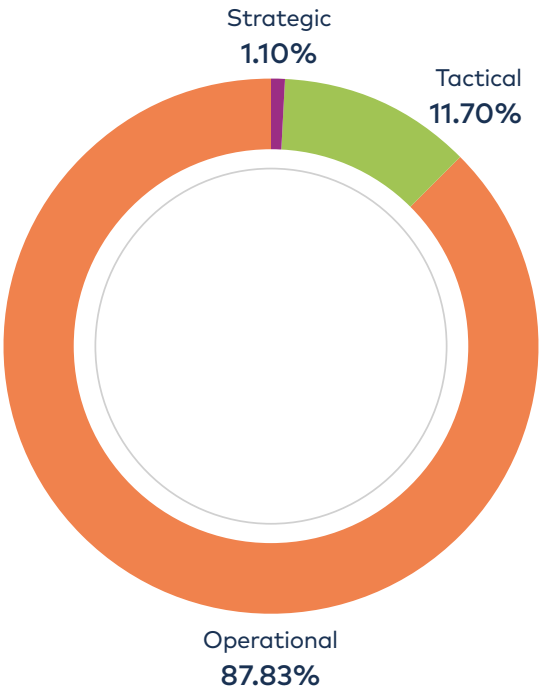
Employee profile

GRI 405-1

Generational Profile

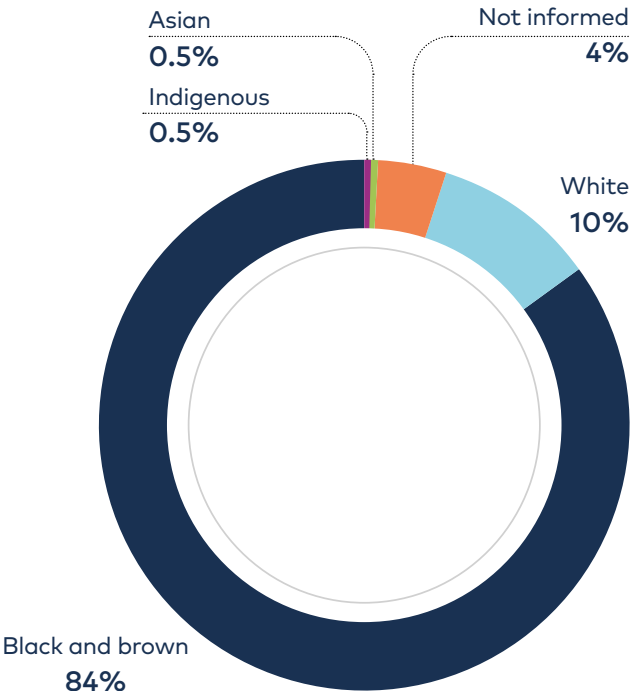


Functional Profile¹



¹ At MILPLAN, functional categories are divided into three levels: the Strategic category includes the CEO, Executive Board, Management, and Coordination. The Tactical level consists of Supervisors, while the Operational level includes administrative and operational employees and interns.

Racial Profile



Attraction and retention

GRI 3-3 | 401-2

Attracting and retaining the right professionals is strategic to ensuring MILPLAN's excellence and sustainable development. We value talent that is aligned with our values, with transparent, objective selection processes based on respect for each candidate.

After being hired, we closely monitor new employees for the first six months, providing onboarding and drawing up action plans based on experience interviews. We also conduct exit interviews to understand the causes of turnover - especially at operational levels - and implement continuous improvements.

We widely communicate our Benefits Policy and Development Plans, strengthening the bond of trust and access to information at every stage of our employees' journey.

MILPLAN Trainee Program 2025

In 2024, we continued with the MILPLAN Trainee Program, reaffirming our commitment to training new talent. This program was designed to attract recent graduates in Mechanical, Electrical, Production or Civil Engineering, who share our values and wish to contribute to building a more sustainable Brazil. Although the program took place in 2024, trainees were hired in 2025.

The Program offers participants a comprehensive view of our operations throughout the country, allowing them to develop hands-on skills and explore diverse areas of expertise. We are looking for individuals who are proactive, open to practice-based learning and able to interact in diverse cultural contexts.

COMPENSATION AND BENEFITS POLICY

MILPLAN applies a compensation policy structured on a matrix basis by corporate HR, aligned with the best market practices and based on ethics, integrity and valuing performance. On projects and construction sites, salaries strictly follow the regional collective bargaining agreements, ensuring legal compliance, consistency with local reality and respect for each contract's particularities.

MILPLAN BENEFITS

- | | | |
|---|--|--|
|  Health and dental plans; |  Access to gyms; |  Agreement with Clube Sesi |
|  Life insurance; |  Language schools for the corporate team; |  Agreement for discounts on electricity bills |
|  Private pension; |  Desenvolver platform for online courses and training. |  Affinity (insurance) |
|  Profit and Results Sharing; |  PAE Program |  Maternity kit |
|  Meal and food vouchers; |  Home Office |  Transportation assistance |
|  Basic-needs grocery package; |  Payroll loan |  Mental health assistance |
|  Partnerships with universities; |  Agreement with pharmacies | |

New hires and employee turnover in 2024

GRI 401-1

The rates shown reflect MILPLAN's natural process of completing and implementing new projects. Each stage requires specific structures and teams, which naturally has an impact on the number of professionals involved.

We try to follow these movements responsibly, always in line with the company's operational needs and commitment to people management.

NEW HIRES

	No. of hires	Hiring rate
Gender		
Female	403	64%
Male	4,197	67%
Region		
North	2,173	65%
Southeast	2,427	68%
Age group		
Under 30 years old	1,412	70%
Between 30 and 50 years old	2,687	67%
Over 50 years old	501	56%
Total	4,600	67%

TERMINATIONS

	No. of terminations	Turnover rate
Gender		
Female	249	40%
Male	3,255	52%
Region		
North	1,627	48%
Southeast	1,877	53%
Age group		
Under 30 years old	1,059	53%
Between 30 and 50 years old	2,027	51%
Over 50 years old	418	47%
Total	3,504	51%

Note: Hiring and termination rates are calculated as the ratio between the number of employees hired or terminated (voluntarily or involuntarily) and the total number of employees in their respective category (gender, region, and age group) at the end of the period.

In 2024, we proudly strengthened our commitment to training new talent. We actively participate in strategic events to present the MILPLAN universe and contribute to the development of future engineering professionals.

14th Civil Engineering Thematic Week

MILPLAN attended the 14th Civil Engineering Thematic Week (SeTEC) at USP's Polytechnic School, an event that connects students to the job market and broadens their vision of an engineering career. We presented our innovations, highlighted opportunities in industrial assembly and restated our commitment to the professional development of future generations.

PUC Minas Career Fair 2024

We also took part in the PUC Minas Careers Fair, an important moment of integration with the academic community. At the fair, we shared our values, development opportunities and what inspires us as a company with students, former students, teachers and employees. We left the event enriched by the exchange of experiences and confident in the potential of the talents that can emerge from these encounters.

Production Engineering Symposium (SiePro)

We were also present at the Production Engineering Symposium (SiePro), also at PUC Minas - Coração Eucarístico unit. At this event, students had the opportunity to learn about our business and the different possibilities for growth at MILPLAN. Our employees Jaqueline Reis and Moises Barbosa shared their journeys, from choosing Production Engineering to working for the company.

We recognize that each interaction with these young engineers is a valuable opportunity to inspire, exchange experiences and nurture talents who, in the future, may become part of our history. That's why we remain committed to contributing to the technical and human training of the professionals who will build tomorrow.



Development and Training

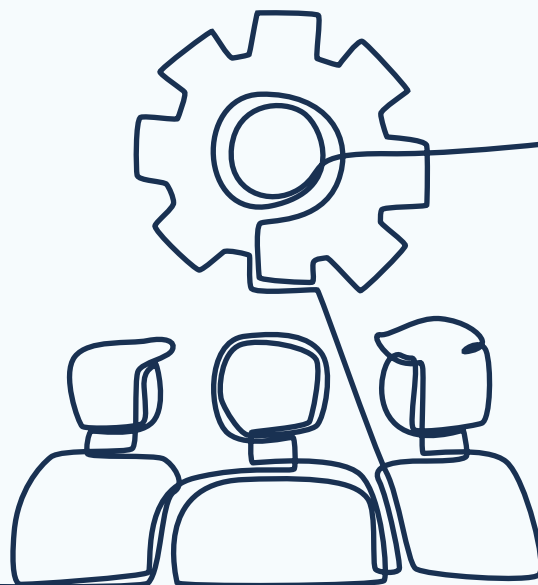
GRI 404-1

The continuous development of people is one of the main pillars for ensuring the continuity and evolution of our business. Throughout 2024, we reinforced this commitment through structured activities that included training programs, immersive training and initiatives aimed at strengthening leadership and technical skills in our operations.

Our training programs are aimed at everyone in the organization, from operational employees to tactical and executive leaders. The main focus is on promoting core competencies, with an emphasis on offering courses aimed at improving strategic areas, especially for the company's operational base.



The 2024 objective was to deploy MILPLAN values-related behaviors beyond leadership.



6,909
EMPLOYEES



296,991*
HOURS OF TRAINING IN THE YEAR



AVERAGE OF
43 HOURS
PER EMPLOYEE

* The total number of hours includes health and safety training, which totaled 284,121 hours in 2024, and the hours of training carried out by the Human and Operational Development area, which totaled 12,870 hours.

Key human development and training initiatives

GRI 404-1 | 404-2



Articuladores do Saber Program

A highlight of 2024 was the Articuladores do Saber (Knowledge Articulators) Program, created to value and disseminate the tacit knowledge of MILPLAN employees, with the areas themselves being responsible for creating and curating content. Participants underwent a 20-hour online training course on content construction and storytelling.

These employees are internal multipliers, connecting hands-on experience with technical knowledge about the company's processes, methodologies and operations. The program focuses on transforming this knowledge into strategic tools, driving innovation and contributing to the continuous improvement of operational performance.



Capacitar Program

With the aim of preparing our employees for operational challenges and strengthening our organizational culture, the Capacitar Program trained **six classes** throughout the year in partnership with SENAI, in the cities of Canaã dos Carajás (PA) and Ouro Branco (MG).

- **Technical Training:** We completed four classes in Mechanical and Electrical courses, totaling **48 employees trained**.

- **Graduation ceremony in two cities:** At the year's end, we celebrated the graduation of **67 employees** who had completed the training course, crowned by a career workshop.
- **Culture #SOMOSMILPLAN:** We presented the MILPLAN culture module, covering the company's strategic vision, values and behaviors related to our culture.

Leadership Participation in Strategic External Events

With the aim of fostering professional development, strengthening our culture of innovation, and broadening the market perspective of our leaders, MILPLAN has mapped and prioritized strategic external

events. Active participation in conferences, trade fairs, seminars, immersion programs, and other relevant initiatives has been encouraged as part of our journey of growth, trend awareness, and appreciation of human capital. In total, 635 man-hours (MH) were dedicated to these activities.



Frontline Program

In 2024, we restructured the Frontline Program, with a focus on aligning the development of Supervisors and Technical Assistants with MILPLAN's strategies. Prioritizing the development of functional leaders, the Frontline Program pushes for a more strategic and systemic vision of the business, aligning technical and behavioral skills with our culture.

The technical content was the responsibility of the Articuladores do Saber Program, while the People Management module was conducted by the ID Singular consultancy. The new structure adopted a more robust approach, with modular, hybrid training integrated into the routine of operations, strengthening the training of leaders in a hands-on and strategic way.

The program was structured in three modules:

- **Module 1 - MILPLAN Culture:** 250 man-hours completed.
- **Module 2 - People Management:** 976 man-hours completed.
- **Module 3 - PMO Principles:** 170 man-hours completed.

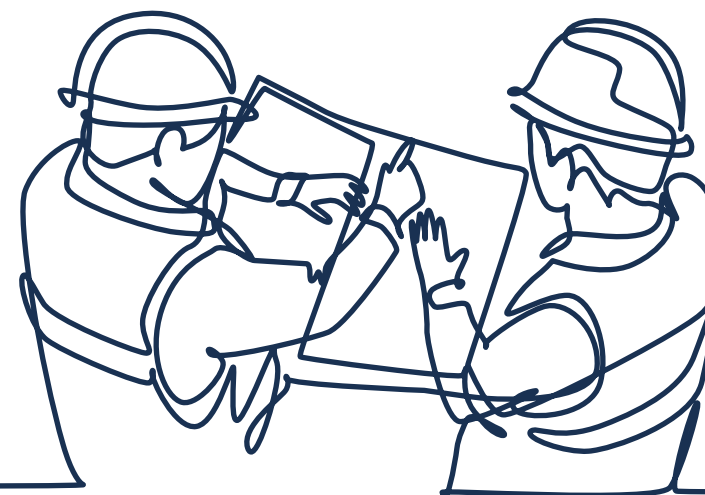
Team Building

As part of our strategy to strengthen the bonds between team members, promoting collaboration, active listening and mutual trust, we have developed Team Building actions with the support of the Human and Organizational Development (HOD) department. The company offers this initiative to new leaders or teams training for new projects, with the aim of creating connections and integrating teams right from the start of their journeys.

The primary focus is to align teams around common goals, identify opportunities for improvement and foster a more cohesive, productive and harmonious working environment.

Activities are developed through the Articuladores do Saber Program and with the support of specialized consultants.

An example of this action took place in the Commercial & Budgeting Department, with the participation of 16 employees over a period of eight hours. In this specific case, we sought to align the team with the expectations of the department's new director. The activity was structured in an outdoor format, with playful-pedagogical dynamics, which provided moments of cooperation, listening and trust among the participants.





Leadership Development Pathway – Milplanverso

We organized an innovative training course for our leaders in the Southeast and North regions. With specialized consultancy, we developed Milplanverso - a gamified business simulation using artificial intelligence, where our leaders were challenged to make decisions in complex scenarios, based on real everyday situations in the company.

During the experience, participants reflected on MILPLAN's values, especially its commitment to collective growth, and applied these principles to their leadership strategies. This action reinforces our focus on training leaders who are prepared to transform realities with purpose and excellence.

The leadership development pathway covered other topics during the year, such as:

- **Design of the Roles and Interactions of the Executive Chairs;**
- **Immersion in Behaviors related to MILPLAN values;**
- **Immersion in Innovation;**
- **Mentoring Program;**
- **Workshop: How to give and receive feedback;**
- **Personalized Coaching for Leaders.**

The total workload for the year for training and development programs and activities is as follows:

TRAINING HOURS BY FUNCTIONAL CATEGORY AND GENDER IN 2024¹ GRI 404-1

Functional category ²	Female (hours)	Male (hours)	Average hours per employee
Strategic	139	1,323	17
Tactical	175	1,621	2
Operational	1,128	8,484	2

¹ Considering the training sessions conducted by the Human and Operational Development department. The table does not include daily safety toolbox talk and mandatory health and safety training.

² At MILPLAN, the functional categories are divided into three levels. The Strategic category includes the CEO, the Board, Management and Coordination. The Tactical level is made up of Supervisors, while the Operational level includes administrative and operational employees and trainees.



Performance Management

GRI 404-3

We have an annual **Performance Evaluation** process for corporate positions - directors, managers, coordinators, specialists, engineers, supervisors and analysts. The evaluation is critical to mapping the progress of employees, considering the achievement of individual goals and serving as a basis for the construction of **Individual Development Plans (IDP)**. In 2024, the evaluation was carried out through a digital platform, using the 180° methodology, focusing on three core pillars:

- The company's organizational values;
- Expected behaviors, such as autonomy and accountability;
- Technical dimension, related to delivering results.

Thanks to this initiative, we are reinforcing our culture of continuous development, recognizing performance and clearly aligning expectations, promoting increasingly strategic and transparent people management.

In 2024, 100% of eligible employees¹ received a performance evaluation.

¹ At MILPLAN, the performance evaluation process applies to directors, managers, coordinators, specialists, engineers, and analysts. Interns, supervisors, operational staff, and employees with less than six months of service are not eligible for performance evaluations.



Diversity and Inclusion

At MILPLAN, we recognize diversity as an essential value and promote the inclusion of different profiles in our operations, valuing the potential of each person and expanding opportunities for their development and advancement within the company.

We have stepped up our commitment to diversity and inclusion, promoting tangible actions aimed at the inclusion of people with disabilities (PWD), immigrants in situations of social vulnerability and the structuring of more equitable processes. As a milestone in this progress, we drew up the Diversity and Inclusion Work Instruction (IT), published in February 2025, setting out guidelines to strengthen a fairer, more welcoming and inclusive organizational culture.

People with disabilities (PwD)

In 2024, we expanded our efforts to include People with Disabilities (PWDs), both by hiring and regularizing employees already on our teams. One of the advances was the partnership with the consultancy PCD & Você, which specializes in the inclusion and development of people with disabilities. The initiative raised awareness in various regions of the country, emphasizing that disabilities can be visible or not, and that everyone has the potential to make an active contribution. As a result, 44 employees were identified and correctly included in the PWD quota, in a sustainable way and with minimal impact on high-risk environments.



The partnership includes:

- **Diagnosis and adaptation of work environments;**
- **Internal awareness actions on inclusion;**
- **Support in classifying employees as disabled;**
- **Continuous support for professional development.**



Results achieved in 2024:

- **44 employees classified as PWD in different projects;**
- **52 employees being examined for possible classification;**
- **Lectures and educational campaigns on PWD rights and benefits.**

We have also forged local partnerships with APAE in Ouro Branco (MG) and the INSS to expand opportunities for inclusion and hire rehabilitated professionals, strengthening our connection with the community and specialized institutions.

"The partnership with MILPLAN has been crucial in bringing information and knowledge to its employees in remote locations throughout Brazil. Through awareness-raising work, we have the opportunity to clarify that disability is not only the apparent disability, but can also be the disability that no one notices. By identifying themselves in this condition, many employees put fear and prejudice aside and recognize that this work also seeks to care for health and preserve everyone's safety."

Jaqueline e Ricardo

Partners of PCD & Você Consulting



Hiring immigrant workers

Diversity is also present in our work fronts through the hiring of immigrant labor. We closely monitor the integration process of these employees, focusing on adaptation, emotional support and professional development.

Main actions carried out:

- Initial support for cultural and linguistic adaptation;
- Continuous monitoring of working and living conditions;
- Training with a focus on retention and performance;
- Retention of a significant number of employees, with successful relocations to new projects.

Improving Inclusive Infrastructure

We have also improved our infrastructure to promote accessibility, such as the installation of adapted toilets in the M.438 construction site accommodation, guaranteeing dignity and better conditions for disabled professionals. We emphasize that diversity goes beyond presence - it involves listening, respect, valuing trajectories and generating real opportunities.

We fortify this commitment with structured actions and a direct impact on people's lives. We remain dedicated to building a more inclusive and welcoming work environment for everyone at MILPLAN.

Operational health and safety

GRI 3-3 | 403-1 | 403-8

MILPLAN has a permanent commitment to promoting occupational health and safety, underpinned by a fully implemented **Management System** certified in accordance with ISO 45001:2018. This system has been developed in compliance with legislation and in line with international best practice, also incorporating the principles of ISO **ISO 9001:2015** (Quality Management) and ISO **ISO 14001:2015** (Environmental Management).

All our employees, whether our own or third parties, are part of this system, ensuring that the Health, Environment and Safety (HSE) guidelines are applied. We demand full compliance with the Regulatory Standards (NRs) and the internal procedures defined by MILPLAN.

Risk and hazard management on construction sites

GRI 403-2

We are involved in the construction and electromechanical assembly of industrial units and complexes, highly complex environments that require rigorous risk management. At MILPLAN, all hazards are identified by the Occupational Safety team and recorded in the **Hazard Reports**, a document that is part of our **Risk Management Program (RMP)**.



"Life is our highest value."



We employ a hierarchy of controls as the basis for managing and prioritizing risks at source, the substitution of processes, administrative measures and, finally, the use of **Personal Protective Equipment (PPE)**. Before each activity, we map the risks and draw up specific operating procedures. The right to refuse is guaranteed and is applied directly in the **Preliminary Risk Analysis (APR)** on the work fronts.

We carry out mandatory and ongoing training, both in-house and for clients, to ensure that employees are trained. Results are monitored by statistical reports, with corrective interventions applied whenever necessary, promoting continuous improvement in safety.

In 2024, the commitment to prevention was reflected in the results:

- **SPT: 0.63** (tolerance: 2.50)
- **SPT AR: 0.63** (tolerance: 0.75)
- **CPT: 0.23** (tolerance: 0.30)
- **Severity: 4.93** (tolerance: 30)

These figures show the success of our structured approach and the involvement of teams in building a safer working environment.

Employee communication and participation

GRI 403-4

We believe that building a safe environment is a collective effort, and we encourage active employee participation in all health and safety processes. We periodically carry out a **Health census** and have an **Internal Commission for Accident and Harassment Prevention (CIPA+A)**. We encourage awareness through the **Internal Week for the Prevention of Accidents at Work (SIPAT)**, training sessions, lectures and educational campaigns.

The leadership takes part in initiatives such as **Café com a Liderança**, and we offer safe channels such as the **Internal Ombudsman** and the **Ethics Reporting Line**, ensuring confidentiality. Occupational examinations, the integration of new employees, **Daily Safety Dialogues (DDS)** and information panels complement these actions.

The **Golden Rules Consequence Management Enforcement Committee** strengthens the safety culture and improves processes.

All employees, own and third parties, participate in these processes, enhancing transparency and continuous improvement.

Training and Development

GRI 403-5 | 404-1

In 2024, we stepped up our investment in training from admission and throughout projects, aligning it with specific needs and the requirements of the NRs. Total man-hours trained (HHT) grew by 52% to **12,774,007 HHT**.

We held technical workshops on construction sites to expand practical knowledge and promoted the **Behavioral Safety Workshop** for leaders, highlighting their strategic role in managing teams and promoting an environment of trust and high performance.



In 2024, MILPLAN carried out 284,121 hours of health and safety training.



Continuous prevention and learning

GRI 403-7

We apply the risk control hierarchy rigorously, prioritizing preventive measures such as the installation and maintenance of **Collective Protective Equipment (CPE)** and the adequate supply of PPE. Awareness is reinforced through preventive campaigns, safety walks with the participation of Leadership and the Board, and regular inspections conducted by the HSE team.

Programs such as **Hands Protection**, aimed at preventing accidents in one of the most exposed areas, and the **Decatlo Recognition Program**, which values safe behavior, are also highlights in our actions to strengthen the safety culture.

During the 2024 internal evaluations, valuable lessons were incorporated into our daily practice:

- **The importance of continuous monitoring;**
- **The decisive role of engaged leadership;**
- **The need for clear and integrated communication;**
- **The learning that comes from analyzing incidents, which guides process improvement.**

These lessons are shared in practical ways through training, campaigns and quarterly meetings with project managers, increasing the collective commitment to safety.

We also recognize that the success of health and safety management also depends on actively listening to and engaging with our network of relationships. We hold formal and informal dialogue channels with shareholders, clients, contractors and communities, striving to incorporate their perceptions and expectations into our strategies.

WORK-RELATED ACCIDENTS³ GRI 403-9¹

	2023	2024 ⁴
	Employees	Employees ²
Number of accidents with serious work-related consequences (excluding fatalities)	-	3
Rate of accidents with serious consequences	-	0.23
Number of work-related accidents with mandatory reporting (including fatalities)	28	-
Rate of accidents with mandatory reporting	2.28	-
Total hours worked	12,269,719	12,774,007

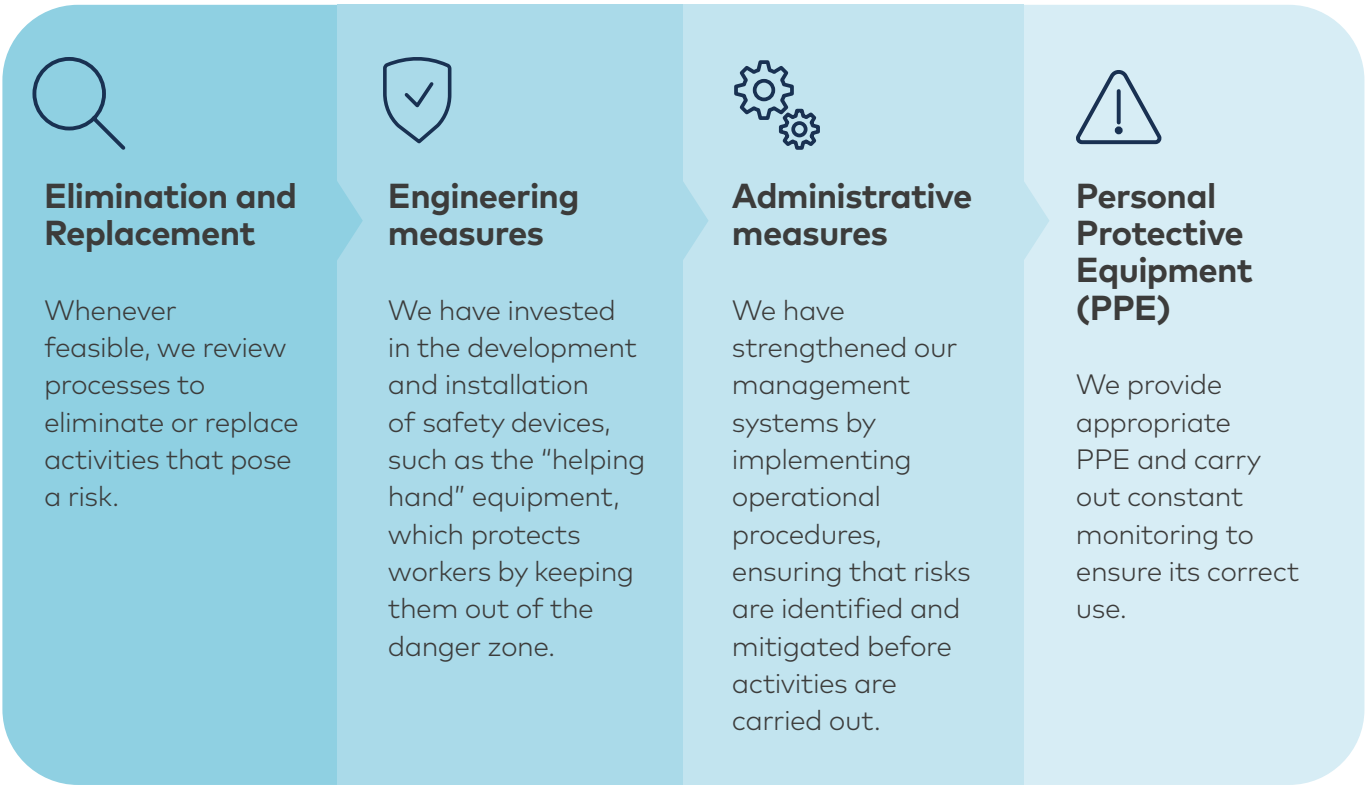
¹ Rates were calculated using a factor of 1 million man-hours worked.

² Among employees, the main types of accidents that occurred in 2024 were lower limb and back accidents. No work-related injuries has resulted in fatalities.

³ The data on work accidents includes the operations of MILPLAN Engenharia e Consórcios.

⁴ At the present time, information on work-related accidents involving third parties is not available. We are working on the best way to consolidate and report this data, in accordance with the indicator's guidelines, and we commit to including it in future reports.

The hierarchy of controls in MILPLAN applies as follows:



Safety management is systematically monitored by the Monthly Statistical Report on Workplace Incidents, which consolidates key data for analysis and decision-making. This report covers deviations and near misses, work accidents classified according to severity and impact, training hours, hours worked, accident investigations and reinforces the Golden Rules, which govern the core safety principles followed by the company.

Occupational health

GRI 403-3 | 403-6

Taking care of employees' health is essential for a safe and productive journey at MILPLAN. We provide structured actions to preserve physical and mental well-being, with occupational health services offered by accredited clinics. We monitor medical examinations on admission, periodic examinations, return examinations and dismissal examinations, referring employees to occupational physicians or specialists when necessary. Nursing teams continuously monitor health in the field, and outpatient clinics are available for prompt care.

The confidentiality of medical data is ensured by an exclusive system accessed only by the health team, protected by the LGPD and the Code of Medical Ethics, with ongoing training to reinforce this ethical conduct.

Occupational exams

We carry out occupational exams with the aim of assessing workers' health and detecting possible illnesses related to the work environment at an early stage. We follow this method not only to comply with the legal requirements set out in regulations such as NR-7 - Medical Examinations, but also as part of a preventive approach that values each professional's well-being.

Occupational health programs

Apart from exams, we implement and monitor essential health protection programs:

PCMSO (Occupational Health Medical Control Program): aims to prevent, track and diagnose occupational diseases early on, monitor exposure to risks and ensure compliance with legal regulations, improving preventive and corrective actions based on the data collected.

PCA (Hearing Conservation Program): seeks to prevent occupational hearing loss through regular audiometric tests, noise exposure control, encouraging the correct use of hearing protectors and educational activities about the risks to hearing.

PPR (Respiratory Protection Program): focuses on reducing exposure to contaminants in the air, such as dust and steam, through the selection and proper use of respirators, specific training and control of respiratory risks in the workplace.

Movimenta MILPLAN

We implemented the "Movimenta MILPLAN" program at our Headquarters, which lasted three months and involved 50 employees. Using gamification and teams, we encouraged a healthier routine, ending with a street race in Belo Horizonte (MG). The program achieved its goal: many sedentary people started doing regular physical activity, improving their quality of life, while those who were already active increased their frequency of exercise.

2024 vaccination campaign

The vaccination campaign in the workplace reflects MILPLAN's concern for the health of its employees and its commitment to disease prevention. As such, we promoted vaccination against influenza, with **96.84% of employees taking part. 2,347** shots were administered to MILPLAN employees, **200** shots to third parties and **40** surplus shots donated to the municipality.



Health census

We applied the Health Census to identify the health risks and conditions of MILPLAN employees, allowing us to plan preventive actions to foster well-being. With the results, we signed a partnership that offers discounts on psychotherapy, with face-to-face services for employees at the Headquarters and online services for others, ensuring broad access to care.

Management of Employees on Leave and Medical Absenteeism

The INSS Leave Management indicator monitors employee sick leave, detailing the number, causes and efficiency in managing these cases. Its aim is to minimize financial and operational impacts, as well as ensuring that the company complies with its legal obligations.

We started 2024 with 191 employees on leave from the INSS. By the end of the year, we had reduced this number to 129. We monitor the cases through an indicator panel and provide guidance to workers. We have also implemented the INSS Guide, with essential information for employees on sick leave.

Ergonomics Guide

In 2024, we published the "Ergonomics Guide: Aspects Related to the Workstation", with recommendations for office and home office environments, to prevent injuries, improve productivity and quality of life.

Health Campaigns

We carry out several prevention and awareness campaigns throughout the year:

- **White January (Mental Health);**
- **Safe Carnival;**
- **Blue March (Colorectal Cancer);**
- **Green April (Sleep and Quality of Life);**
- **HiperDia (Hypertension and Diabetes);**
- **Winter Care;**
- **Viral Hepatitis;**
- **Yellow September (Suicide Prevention);**
- **Pink October (Breast Cancer);**
- **Blue November (Prostate Cancer);**
- **Orange December (Skin Cancer).**

All these initiatives underline our commitment to the health, safety and quality of life of our employees, which are cornerstones for our business sustainability.

Human Rights

GRI 3-3 | 2-23| 408-1 | 409-1

Our Human Rights practices are officialized in the **Code of Conduct** and in the **Business Risk Matrix**, which guide decisions and monitor potential negative impacts, allowing us to map, assess and prioritize risks, also considering the engagement of our internal relationship network.

We have adopted a structured social responsibility strategy, with community relations analysts at each construction site, ensuring continuous communication and active listening to the locations close to our areas of operation.

We also have institutional commitments signed through policies and standards that deal directly with the protection and promotion of human rights, such as:

- **Code of Conduct;**
- **Consequence Management Policy;**
- **Social Responsibility Plan;**
- **Internal Rules of the Integrity Committee.**

To ensure the effectiveness of its actions, MILPLAN maintains a structured follow-up: the Social Responsibility team reports to the **Social Responsibility Committee**, and statistics from the Ethics Channel are used

to monitor integrity and risk prevention. The objectives and targets are incorporated into the Corporate Risk Matrix, whose annual review by the **Integrity Committee** encompasses lessons learned, driving continuous improvement in the management of relevant issues.

Human rights risks

MILPLAN's value chain is the most sensitive point in terms of human rights risks, especially in relations with suppliers and service providers. To mitigate these risks, we have taken strict preventive measures, including contractual clauses prohibiting child labor and conditions similar to slavery, applicable to both direct operations and business partnerships.

Active inspection by MILPLAN and its clients strictly monitors compliance with labor legislation and ethical guidelines. We also strictly control employees' working hours, especially overtime, ensuring fair and legal conditions.

We recognize that around 5% to 10% of contracts follow the suppliers' standards. This situation usually occurs when contracting is unavoidable and there are no other options available on the market. In those cases where it is necessary to use the supplier's draft, we





adopt mitigating measures, such as careful review of the documents by our legal team. They analyze each contract, including comments and adjustments whenever possible, reinforcing our commitment to preserving the principles of respect for human rights, even outside our usual standards.

Accommodation Infrastructure and Quality of Life

Some of the professionals working on MILPLAN projects live in accommodation or hostels provided by the company, which follow quality standards defined by MILPLAN and its clients, guaranteeing comfort, dignity and respect for human rights. The condition of these accommodations is continuously monitored by the administrative team and the users themselves, with the support of secure communication channels such as the Ethics Channel and internal channels for suggestions, making it easier to listen actively and constantly improve.

In some units, depending on the location, the accommodations offer special infrastructure, including air-conditioned rooms, gyms, soccer fields, leisure areas and industrial kitchens with healthy meals. We also promote recreational and cultural activities to strengthen the community and employees' well-being.

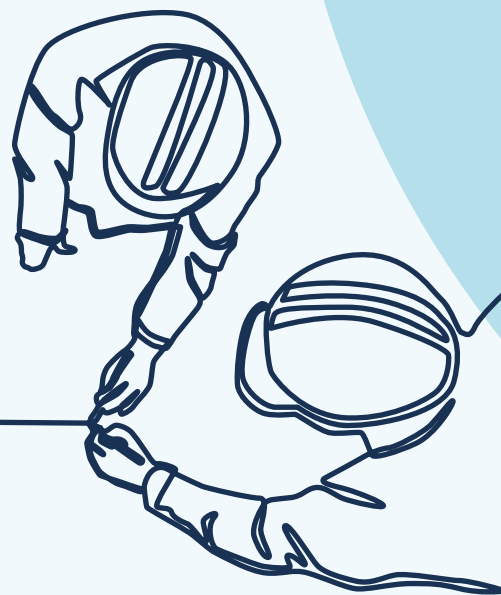
Community relations

GRI 3-3 | 2-29 | 203-1 | 413-1

In 2024, MILPLAN boosted its commitment to sustainable development and the well-being of communities through 78 social actions, including its own resources, incentives, contractual clauses and volunteering.

These initiatives directly impacted 6,437 people in several regions, with 74.8% of the resources invested locally, contributing to the communities' economy.

BRL 2.9 million was invested in social, cultural and educational projects, in addition to the donation of over three tons of food. The initiatives involved 42 partner institutions and took place in all (100%) the locations where the company operates, reaffirming its commitment to equality, inclusion and social responsibility.



OUR SOCIAL RESULTS IN 2024



78

SOCIAL
ACTIONS,
CAMPAIGNS,
AND PROJECTS



6,437

DIRECT BENEFICIARIES



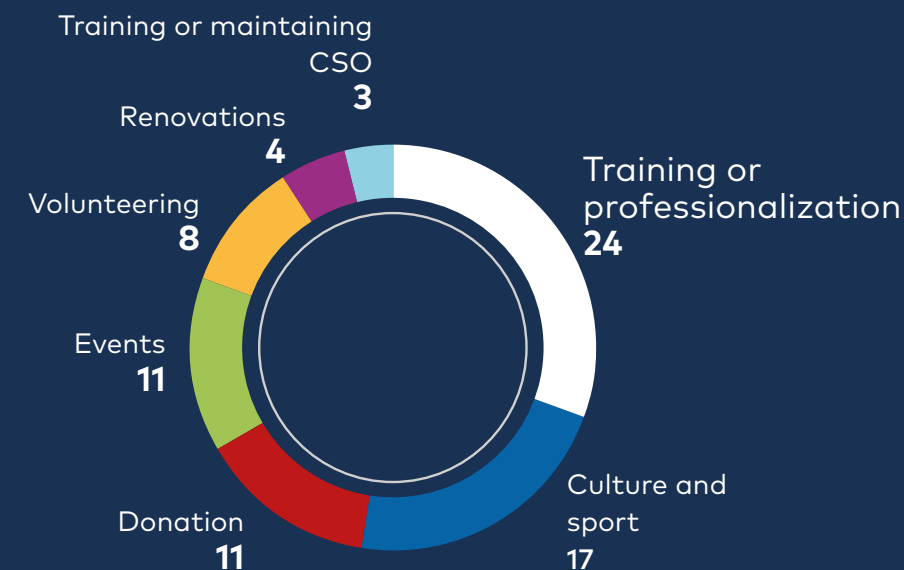
BRL 2,941,526.19

INVESTED IN SOCIAL RESPONSIBILITY, INCLUDING TAX
INCENTIVE PROJECTS

Initiatives x Location



Project type



SDGs
addressed

8 TRABALHO DECENTE
E CRESCIMENTO
ECONÔMICO



10 REDUÇÃO DAS
DESIGUALDADES



4 EDUCAÇÃO DE
QUALIDADE



16 PAZ, JUSTIÇA E
INSTITUIÇÕES
EFICAZES



11 CIDADES E
COMUNIDADES
SUSTENTÁVEIS



5 IGUALDADE
DE GÊNERO



3 SAÚDE E
BEM-ESTAR



9 INDÚSTRIA, INOVAÇÃO
E INFRAESTRUTURA



1 POBRESSEZ
ERADICADA



2 ENERGIA
LIMPA E
ACESSÍVEL



Social Projects Portfolio

MILPLAN's Project Portfolio concentrates the company's social investment, aligning actions with the Social Responsibility Plan, institutional values and community demands. With works of short to medium duration, it standardizes initiatives to ensure a lasting legacy in the places where it operates:

impact mil

Impacto MIL strengthens Civil Society Organizations (CSOs) to increase the impact of their social initiatives. Through a collaborative approach, it provides training in management, fundraising, project preparation and monitoring, and accountability.

In 2024, **52 hours of training** and **54 hours of mentoring** were offered, and the CSOs prepared projects that totaled **BRL 1,042,647.25** available for funding (BRL 983,101.33 in tax incentives and BRL 59,545.92 in private social investment).

MILPLAN runs the program in line with real-life local situations, with document assessment, theoretical classes, mentoring and identification of improvements for CSOs. The program results in the submission of projects for fundraising, preparing organizations to operate efficiently and sustainably, as well as promoting the exchange of experiences and social collaboration.



[CLICK HERE](#) to learn more about the program



2 classes

Belo Horizonte (MG)
Canaã dos Carajás (PA)



520

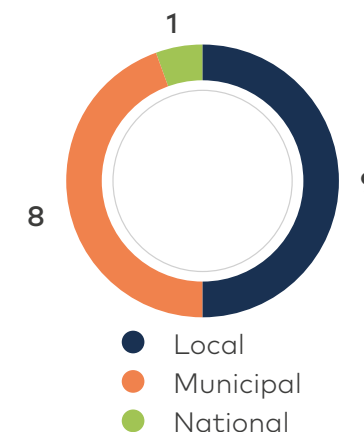
Direct
beneficiaries



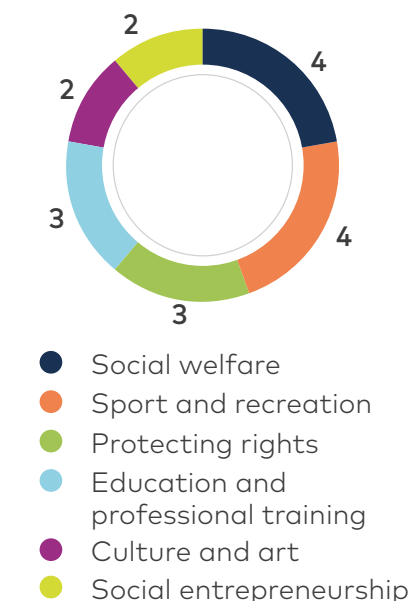
70%

Attendance

CSO size



CSO segment



MULHERES MIL

Women MIL promotes gender equality by training women in technical areas of industry. In 2024, three classes were offered: Welding and Electrical Assembly (200h) in Ouro Branco/MG, and Industrial Electrical (220h) in Canaã dos Carajás/PA, defined on the basis of a socio-territorial diagnosis and alignment with local SENAls and the demands of regional industries.

The project benefited 60 women aged between 18 and 58, 75% of whom said they were non-white, 93% had a per capita income of less than one minimum wage and 77% were on the CadÚnico. When they joined, 61% were unemployed and 21% were not studying or working. The majority had completed high school (88%).

To ensure participation and safety, transportation (in Ouro Branco), uniforms and PPE were provided. The project achieved 76% retention, 88.27% average attendance and 80.6% average grade. In the end, 43.3% of the trainees were hired by MILPLAN, with a 62.8% increase in per capita family income. The others were referred to partner companies and all continue to be monitored by local HR, strengthening their professional integration.



[CLICK HERE](#) to learn more
about the program



60
Women
beneficiaries



80%
Performance



88%
Attendance



62,8% increase in the average
per capita family income of women
hired by MILPLAN



For every **BRL 1** invested,
the project generated a social
return of **BRL 6.43**



recriamil

Recria MIL is a MILPLAN initiative that fosters sustainability and inclusion by training people in sewing, with a focus on reusing the company's own uniforms. The garments produced are made from textile waste that would otherwise be discarded, helping to reduce environmental impacts and offering professional training.

The first class of the program is taking place in Ouro Branco (MG), in partnership with SENAI and APAE, with a focus on the inclusion of people with disabilities (PwDs). Participants receive training in sewing techniques, learning how to transform used uniforms into new, creative and useful products, expanding their opportunities to join the job market.



[CLICK HERE](#) to learn more
about the program

Corporate Volunteering

MÃOS À OBRA PROGRAM

MILPLAN's Mãos à Obra Corporate Volunteering Program mobilizes employees in social actions that promote human development and the transformation of the territories where the company operates.

In 2024, volunteers carried out activities in Belo Horizonte, Ouro Branco, Conceição do Mato Dentro (MG) and Tomé-Açu (PA), collecting books, toys and hygiene items, as well as lectures and recreational events for children and the elderly.

By 2025, a volunteering policy is to be created to structure the actions and make it possible to monitor their results.



CHILDREN'S MONTH

In celebration of Children's Month, MILPLAN held Super Kids, a volunteer event that brought together employees and their children to bring joy to 120 children cared for by the Pequenos do Amor institution in Belo Horizonte (MG). The event included games, typical food and moments of affection. The association offers workshops, tutoring, psychological support and donations to around 150 children and teenagers.

The celebration also extended to the construction sites in Canaã dos Carajás (PA), Ouro Branco (MG) and Conceição do Mato Dentro (MG), with recreational activities for the children of the local communities.



[CLICK HERE](#) to learn more about the event

Tax incentive projects

The tax incentive projects sponsored by MILPLAN were approved at the end of 2023 and carried out throughout 2024. The initiatives reinforce the company's commitment to the social, cultural and sporting development of the communities where it operates.

CEDER PARA VENCER PROJECT

In partnership with Projeto Ajudô, we are supporting judo classes for 107 children and teenagers in Ouro Branco (MG), held twice a week throughout 2024. The initiative, made possible by the Sports Incentive Law, is part of the Sport for All III project and fosters discipline, health and inclusion through sport.



CLICK HERE
to watch the
project video

PANELA HISTÓRICA PROJECT

The Panela Histórica project, sponsored by the Federal Culture Incentive Law and conceived by the Instituto Cultural Amazônia do Amanhã (ICAA), included the production of a cookbook on Pará cuisine, a documentary on the culture of Marabá (PA) and a photographic exhibition. In return, the ICAA offered six classes in the "Gastronomy of Tomorrow" project (four in Canaã dos Carajás

- PA and two in Parauapebas - PA).

Special mention should be made of the first two classes in Canaã dos Carajás (PA), which were held at the APAE headquarters. Both focused on diversity and inclusion, with 15 disabled students taking part, including people with intellectual disabilities, autism and Down's Syndrome.



LER É VIVER PROJECT

The Gil Nogueira Institute's Ler é Viver project was sponsored by the Federal Culture Incentive Law to promote reading among 1st to 5th grade students at the Pedro Nava Municipal School - Belo Horizonte (MG) and the Cristiano Machado State School - Dom Joaquim (MG).

Reading competitions were held with prizes and 12 storytelling presentations, impacting around 820 students. The initiative encourages the habit of reading and writing and recognizes the most engaged students.

ASSOCIAÇÃO CULTURAL CASA DE MÚSICA DE OURO BRANCO

Through the Federal Cultural Incentive Law, we sponsored the two-year plan to maintain the activities of the Cultural Association Casa de Música de Ouro Branco, ensuring the continuity of the association's and orchestra's activities.

In March, Ouro Branco (MG) hosted the 10th Cello Festival, sponsored by MILPLAN, which brought together young musicians from all over Brazil for workshops, masterclasses, lectures and essays, promoting music education and encouragement.

Community impact management

GRI 3-3 | 2-29 | 413-2

We recognize that most of the significant impacts on construction sites are the responsibility of clients, such as resettlements and conflicts with indigenous and quilombola communities. However, we also take responsibility for the impacts of labor mobilization, dust and noise on neighboring communities.

To this end, we carry out risk mapping prior to construction work and participate in clients' environmental mitigation plans. We produce periodic reports on local hiring, compensation plans, road wetting and promote community dialogue through the Community Relations team, which is integrated with the site management and Social Responsibility at the Headquarters.

We believe that open dialog and building relationships of trust with communities and clients are key to overcoming challenges and fostering local socio-economic development, aligning our processes with the needs and expectations of everyone involved.

ACTIVE LISTENING

MILPLAN values open and continuous dialogue with organizations in society, adapting its practices to the specific realities and demands of each region.

We also have an independent **Ethics Reporting Hotline** to receive complaints and concerns about operations, ensuring proper monitoring, transparency and accountability in the company's practices and relations with communities.



Local procurement

GRI 204-1

MILPLAN seeks to strengthen the communities where it is present, adopting the practice of prioritizing local suppliers in the acquisition of inputs and services, whenever feasible.



In 2024, this guideline resulted in 26.38% of the company's total purchases going to suppliers in the regions where we operate, contributing to local economic development and jobs and income generation.

TOTAL RESOURCES ALLOCATED TO LOCAL SUPPLIERS

Values in BRL Thousand	2022	2023	2024
Spending on local suppliers	128.623.000	139.515.116	106.289.347
Total spending on suppliers	535.620.000	717.967.058	402.873.354
Percentage of Spending on Local Suppliers	24%	19%	26%

* The analysis includes 100% of the works in progress. Only purchases made by the headquarters, São Paulo Branch and Northern Branch are excluded, as they are expenses related to investments and the administrative operation of these units, which do not qualify as construction projects.

PERCENTAGE OF LOCAL SUPPLIERS HIRED

Year	Percentage
2020	64.58%
2021	63.30%
2022	35.33%
2023	32.10%
2024	49.80%

Note: MILPLAN considers local suppliers to be those established near its operational units. When the operation is located in large urban centers, companies in the respective Metropolitan Region are considered local. In more remote regions, suppliers located in cities with basic infrastructure closest to the construction site are considered local.

8

ATTACHMENTS

GRI Content Index.....	92
Credits.....	103



GRI Content Index

GRI STANDARDS	CONTENT	DIRECT ANSWER/REFERENCE (PAGE)	PRIORITY SDG
General Disclosures			
The organization and its reporting practices			
GRI 2: General Disclosures 2021	2-1	Organization details	Page 11.
	2-2	Entities included in the organization's sustainability report	This report refers to the activities of MILPLAN Engenharia S.A.
	2-3	Reporting period, frequency, and contact point	Page 4.
	2-4	Restatements of information	Previous information had to be restated for indicator 207-4 - Country-by-Country Reporting, item XX. Reasons for the difference between corporate income tax levied on profits/losses and the tax due if the rate set by law is applied to pre-tax profits/losses. The corrected information for 2023 is that the tax recorded in the income statement refers to the amount calculated on the profit for the year 2023. The amount shown under liabilities corresponds to the balance of this tax, minus the amounts paid over the period.
	2-5	External assurance	This Sustainability Report has not been subjected to external assurance.
Activities and workers			
GRI 2: General Disclosures 2021	2-6	Activities, value chain, and other business relationships	Page 11.
	2-7	Employees	Page 61. SDG 8 and 10
	2-8	Workers who are not employees	Given the nature of our business, we work with several outsourced workers on different fronts, who are vital to the success of our operation. We are working out the best way to consolidate and report this data in accordance with the indicator's guidelines and will include it in future reports. SDG 8 and 10
Governance			
GRI 2: General Disclosures 2021	2-9	Governance structure and composition	Pages 18 to 22. SDG 16
	2-10	Nomination and selection of the highest governance body	Pages 20 to 22. SDG 5 and 16
	2-11	Chair of the highest governance body	Page 20. SDG 16

GRI STANDARDS	CONTENT		DIRECT ANSWER/REFERENCE (PAGE)	PRIORITY SDG
GRI 2: General Disclosures 2021	2-12	Role of the highest governance body in overseeing the management of impacts	Page 20.	SDG 16
	2-13	Delegation of responsibility for managing impacts	MILPLAN adopts an Internal Corporate Integrity Standard, which establishes the role of the Corporate Integrity Committee and Board of Directors in defining and delegating responsibilities related to impact management.	
	2-14	Role of the highest governance body in sustainability reporting	MILPLAN's Commercial Director, responsible for the ESG department, validates the final report, ensuring that it reflects the company's commitments and practices. The report is also developed by in-house experts on the subject.	
	2-15	Conflicts of interest	MILPLAN's Code of Conduct provides clear guidelines on managing conflicts of interest. When such conflicts are identified, the company's senior management takes responsibility for dealing with them directly and effectively.	SDG 16
	2-16	Communication of critical concerns	Pages 2 and 28.	
	2-17	Collective knowledge of the highest governance body	Page 18.	
	2-18	Evaluation of the performance of the highest governance body	Currently, the Board of Directors does not participate in a formal Performance Evaluation process.	
	2-19	Remuneration policies	The compensation policy for Board members includes fixed and variable remuneration, as well as attraction bonuses. It is based on market research and benchmarking. The People and Management department is responsible for managing this policy, which is approved by senior management.	
	2-20	Process to determine remuneration	For the reporting period, information on compensation calculation and proportion is unavailable. We are actively working on surveying and improving the necessary processes to ensure that we can report this information clearly.	
	2-21	Annual total compensation ratio		
Strategy, policies and practices				
GRI 2: General Disclosures 2021	2-22	Statement on sustainable development strategy	Pages 5 and 30.	
	2-23	Policy commitments	Pages 24 and 80.	
	2-24	Embedding policy commitments	Page 31.	
	2-25	Processes to remediate negative impacts	Page 26.	
GRI 2: General Disclosures 2021	2-26	Mechanisms for seeking advice and raising concerns	Pages 24 and 26.	SDG 16

GRI STANDARDS	CONTENT		DIRECT ANSWER/REFERENCE (PAGE)	PRIORITY SDG
GRI 2: General Disclosures 2021	2-27	Compliance with laws and regulations	There were no cases of non-compliance with laws and regulations that resulted in sanctions or fines during the reporting period.	SDG 16
	2-28	Membership associations	MILPLAN's CEO is an alternate member of the Vice-Presidency of Sinduscon (MG) and also coordinates FIEMG's Chamber of Industrial Construction.	SDG 16
Stakeholder engagement				
GRI 2: General Disclosures 2021	2-29	Approach to stakeholder engagement	MILPLAN values ethical, strategic and lasting relations with its stakeholders, guided by rules such as the Code of Conduct. It has a Corporate Communications department dedicated to dialog and building partnerships with public and private institutions, including employees, communities, suppliers, clients, trade unions and the government.	
	2-30	Collective bargaining agreements	MILPLAN ensures that 99.6% of its employees are covered by collective bargaining agreements. The only exception is interns, who are not included as they have no employment relationship.	SDG 8
Material Topics				
GRI 3: Material Topics 2021	3-1	Process to determine material topics	Page 33.	
	3-2	List of material topics	Page 33.	
	3-3	Management of material topics: Occupational Health and Safety	Page 74.	SDG 3 and 8
	3-3	Management of material topics: Talent Attraction and Retention	Page 64.	SDG 4, 5 and 10
	3-3	Management of material topics: Environmental Management	Page 47.	SDG 7, 9, 11 and 13
	3-3	Management of material topics: Decarbonization	Page 52.	SDG 13
	3-3	Management of material topics: Community Relations	Pages 82 and 89.	SDG 1, 2, 10 and 11
	3-3	Management of material topics: Ethics and Compliance	Page 24.	SDG 16
	3-3	Management of material topics: Economic Performance	Page 14.	SDG 16
	3-3	Management of material topics: Human Rights	Page 80.	SDG 10

GRI STANDARDS	CONTENT		DIRECT ANSWER/REFERENCE (PAGE)	PRIORITY SDG
Economic Disclosures				
GRI 201: Economic Performance 2016	201-1	Direct economic value generated and distributed	Page 14.	SDG 8 and 9
	201-4	Financial assistance received from government	MILPLAN uses tax incentives to allocate part of the taxes due to social and economic development projects, in initiatives that promote well-being, culture, sport and innovation. In 2024, the company allocated BRL 761,118.38 to the Workers' Food Program (PAT). BRL 1,280,000.00 was invested in projects through incentive laws, such as the Rouanet Law (culture), the FMDCA (Municipal Fund for the Rights of Children and Adolescents), the Sports Incentive Law and the FMI (Municipal Fund for the Elderly). In addition, BRL 378,857.07 was invested via the Lei do Bem (Good Law), which stimulates research and technological innovation in the country.	SDG 8 and 10
GRI 202: Market Presence 2016	202-1	Ratios of standard entry level wage by gender compared to local minimum wage	In 2024, the local minimum wage was BRL 1,412.00. At MILPLAN, the company's lowest salary was BRL 1,520.00 for both men and women, which is 7.6 % above the local minimum wage, ensuring equal pay for both genders.	SDG 1, 5 and 8
	202-2	Proportion of senior management hired from the local community	All our directors come from Belo Horizonte (MG), the city where MILPLAN's headquarters are located.	SDG 8
GRI 203: Indirect Economic Impacts 2016	203-1	Infrastructure investments and services supported	Page 82.	SDG 5, 9 and 11
	203-2	Significant indirect economic impacts	MILPLAN's presence in the communities where it operates represents an opportunity to boost the economy. By mobilizing manpower for the projects, we contribute directly to increasing the flow of people in the region, which in turn strengthens local commerce and stimulates the development of the surrounding economies. The company recognizes this positive impact and values the role it plays in fostering communities.	SDG 1, 3, 8 and 11
GRI 204: Procurement Practices 2016	204-1	Proportion of spending on local suppliers	Page 90.	SDG 11
GRI 205: Anti-corruption 2016	205-1	Total number and percentage of operations assessed for risks related to corruption	Page 24.	SDG 16
	205-2	Communication and training about anti-corruption policies and procedures	Page 24.	SDG 16
	205-3	Confirmed incidents of corruption and actions taken	Page 24.	SDG 16

GRI STANDARDS	CONTENT		DIRECT ANSWER/REFERENCE (PAGE)	PRIORITY SDG
GRI 206: Anti-competitive Behavior 2016	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	During the reporting period, there were no legal actions related to anti-competitive behavior.	SDG 16
GRI 207: Tax 2019	207-1	Approach to tax	<p>MILPLAN operates in compliance with the tax legislation in force at the municipal, state and federal levels. The tax strategy is supported by the constant updating of the team working in the area and by the validation of operations with market professionals, backed up by legal opinions from the Finance Department and final approval by the Board of Directors.</p> <p>We revise our tax strategy annually or whenever necessary. The company is subject to independent external audits, which assess tax calculation based on current legislation, enhancing process transparency and compliance.</p> <p>We monitor regulatory compliance through the periodic issuance of negative certificates and internal controls of the fiscal and tax agenda. We rely on specialized consultants for routine matters and legal offices for more complex cases, as well as formal consultations with tax authorities whenever necessary.</p> <p>Our tax approach is linked to business strategy and sustainable development, considering the tax burden as a strategic factor. We work together with the Budget, Commercial and Controllershship departments, seeking a balance between competitiveness and tax compliance.</p> <p>We also direct funds through tax incentives to social projects, such as the Child and Adolescent Fund, the Elderly Fund and the Rouanet Law, strengthening our commitment to socio-economic development.</p> <p>All the information presented here covers 100% of MILPLAN's operations.</p>	

GRI STANDARDS	CONTENT	DIRECT ANSWER/REFERENCE (PAGE)	PRIORITY SDG
GRI 207: Tax 2019	207-2 Tax governance, control, and risk management	<p>The Controllershship department, led by the Chief Financial Officer, is responsible for implementing the tax strategy approved by the Board of Directors.</p> <p>The tax department works closely with the company's different sectors, organizing specific training sessions according to each area. The Controllershship department also has specialized legal advice and is encouraged to take part in external training, with a focus on tax reform.</p> <p>Tax risks are identified by analyzing documents, monitoring the tax situation and following up on legislation. Tax transactions are validated in advance and compliance is monitored through internal controls. MILPLAN takes a conservative stance, acting with low risk and validating specific strategies with legal opinions from independent offices. An annual external audit is carried out, with preliminary and final stages, including verification of tax calculation. We have a Reporting Channel for safe reporting of unethical or illegal behavior, reinforcing our commitment to integrity and transparency.</p>	
	207-3 Stakeholder engagement and management of concerns related to taxes	<p>We advise our employees to maintain a posture of respect and transparency in their dealings with the tax authorities. All operations are conducted on the basis of current legislation, which governs the resolution of internal doubts. Should there be any discrepancies, we turn to external tax consultants, ensuring certainty and compliance in our decisions.</p> <p>MILPLAN does not engage in tax-related public policy, focusing instead on the ethical and responsible management of tax obligations.</p> <p>The opinions and concerns of our employees on tax issues are collected and assessed through regular meetings between the areas involved and the Finance Department, reporting to the Board of Directors. Our commitment to compliance covers 100% of the main and ancillary obligations linked to operating revenue, while other operations are dealt with on an ongoing basis as the need arises.</p>	

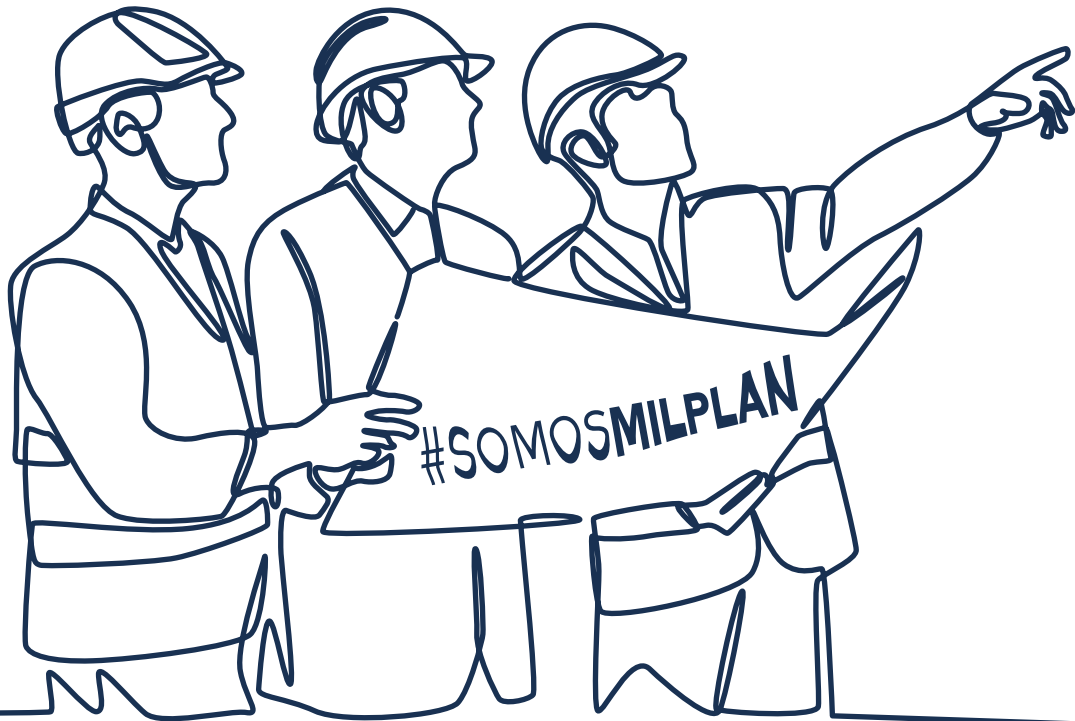
GRI STANDARDS	CONTENT	DIRECT ANSWER/REFERENCE (PAGE)	PRIORITY SDG
GRI 207: Tax 2019	207-4 Country-by-country reporting	<p>"i. Names of resident entities: MILPLAN Engenharia S.A.</p> <p>ii. Primary activities of the organization: The Company has the corporate purpose and carries out the following activities:</p> <ul style="list-style-type: none">• Construction works and electromechanical assembly of units and industrial complexes;• Engineering services related to civil construction and electromechanical assembly of industrial units and complexes;• Maintenance of industrial units and complexes;• Assembly of metal structures;• Network construction of water supply, sewage, and related structures;• Network construction of pipeline transport;• Port, maritime, and river works;• Earthwork, foundation, and masonry works;• Equipment leasing;• Management and technical consultancy in construction of units and industrial complexes;• Combined office and administrative support services. <p>iii. Number of employees and base for calculation for this item: 6,909 employees.</p> <p>iv. Revenues from third-party sales: BRL 1,046,274.301</p> <p>v. Revenues from intra-group transactions with other tax jurisdictions: None.</p> <p>vi. Profit/loss before tax: BRL 137,746,796</p> <p>vii. Tangible assets other than cash and cash equivalents: BRL 100,509,439</p> <p>viii. Corporate income tax paid on a cash basis: Taxes are paid on an accrual basis, not on a cash basis.</p> <p>ix. Corporate income tax accrued on profit/loss: BRL 29,317,152</p> <p>x. Reasons for the difference between corporate income tax accrued on profit/loss and the tax due if the statutory tax rate is applied to profit/loss before tax: The tax recorded in the income statement refers to the amount calculated on the profit for the year 2024. The amount presented in liabilities corresponds to the balance of this tax, less the amounts paid over the period.</p> <p>c. The reporting period for the information provided in Content 207-4: Fiscal Year 2024"</p>	

GRI STANDARDS	CONTENT		DIRECT ANSWER/REFERENCE (PAGE)	PRIORITY SDG
Environmental Disclosures				
GRI 301: Materials 2016	301-1	Materials used by weight or volume	Page 57.	
GRI 302: Energy 2016	302-1	Energy consumption within the organization	Page 53.	
	302-3	Energy intensity	Page 53.	
	302-4	Reduction of energy consumption	Page 53.	
GRI 303: Water and Effluents 2018	303-1	Interactions with water as a shared resource	Page 55.	
	303-3	Total water withdrawal	Page 55.	
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	Page 50.	SDG 13
	305-2	Energy indirect (Scope 2) GHG emissions	Page 50.	SDG 13
	305-3	Other indirect (Scope 3) GHG emissions	Page 50.	SDG 13
	305-4	GHG emissions intensity	Page 50.	SDG 13
	305-5	Reduction of GHG emissions	Page 50.	SDG 13
GRI 306: Waste 2020	306-1	Waste generation and significant waste-related impacts	Page 57.	
	306-2	Management of significant waste-related impacts	Page 57.	
	306-3	Waste generated	Page 57.	
GRI 306: Waste 2020	306-4	Total weight of waste diverted from disposal	Page 57.	
	306-5	Total weight of waste directed to disposal	Page 57.	

GRI STANDARDS	CONTENT		DIRECT ANSWER/REFERENCE (PAGE)	PRIORITY SDG
Social Disclosures				
GRI 401: Employment 2016	401-1	New employee hires and employee turnovers	Page 65.	SDG 5, 8 and 10
	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation	Page 64.	SDG 3, 5 and 8
	401-3	Parental leave	With the exception of trainees and young apprentices, all MILPLAN employees are guaranteed the right to parental leave. During the period, six employees took maternity leave. All of them returned to work in the same year, resulting in a 100% return rate among women. Among men, there were no records of leave during the year.	SDG 5 and 8
GRI 403: Occupational Health and Safety 2018	403-1	Occupational health and safety management system	Page 74.	SDG 3 and 8
	403-2	Hazard identification, risk assessment, and incident investigation	Page 74.	SDG 8
	403-3	Occupational health services	Page 78.	SDG 3 and 8
	403-4	Worker participation, consultation, and communication on occupational health and safety	Page 75.	SDG 8 and 16
	403-5	Worker training on occupational health and safety	Page 75.	SDG 3 and 8
	403-6	Promotion of worker health	Page 78.	SDG 3
	403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Page 76.	SDG 8
	403-8	Workers covered by an occupational health and safety management system	Page 74.	SDG 8
GRI 403: Occupational Health and Safety 2018	403-9	Work-related injuries	Page 77.	SDG 3, 8 and 16
	403-10	Work-related ill health	There were no recorded cases of work-related ill health in 2024.	SDG 3, 8 and 16

GRI STANDARDS	CONTENT		DIRECT ANSWER/REFERENCE (PAGE)	PRIORITY SDG
GRI 404: Training and Education 2016	404-1	Average hours of training per year per employee	Pages 67, 68, 70 and 75. Currently, health and safety training hours are not yet monitored by functional category and gender, which makes it impossible to meet these requirements. MILPLAN is committed to improving this control for the next reporting cycles.	SDG 4, 5, 8 and 10
	404-2	Transition assistance programs provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment	Page 68.	SDG 8
	404-3	Percentage of employees receiving regular performance and career development reviews	Page 71.	SDG 5, 8 and 10
GRI 405: Diversidade e Igualdade de Oportunidades 2016	405-1	Diversidade em órgãos de governança e empregados	Pages 20, 21, 22, 62 and 63.	SDG 5 and 8
GRI 406: Não Discriminação 2016	406-1	Casos de discriminação e medidas corretivas tomadas	During the period, one report of possible discrimination was filed. After a thorough investigation, no discriminatory behavior was identified. Nevertheless, follow-up was conducted with the employee involved, including guidance on workplace conduct and the issuance of a verbal warning.	SDG 5 and 8
GRI 408: Trabalho Infantil 2016	408-1	Operações e fornecedores com risco significativo de casos de trabalho infantil	In 2024, no suppliers were identified as presenting a risk of child labor.	SDG 8 and 16
GRI 409: Trabalho Forçado ou Análogo ao Escravo 2016	409-1	Operações e fornecedores com risco significativo de casos de trabalho forçado ou análogo ao escravo	Page 80.	SDG 8

GRI STANDARDS	CONTENT		DIRECT ANSWER/REFERENCE (PAGE)	PRIORITY SDG
GRI 411: Direitos dos povos indígenas 2016	411-1	Casos de violação de direitos de povos indígenas	During the reporting period, no cases of violations of Indigenous peoples' rights were identified.	SDG 2
	413-1	Operações com engajamento, avaliações de impacto e programas de desenvolvimento voltados à comunidade local	Page 82.	SDG 1 and 11
GRI 413: Comunidades locais 2016	413-2	Operações com impactos negativos potenciais significativos – reais e potenciais – nas comunidades locais	Page 82.	SDG 1 and 11





Credits

CORPORATE INFORMATION

Address (Headquarters): Rua Nossa Senhora de Lourdes, 262 – Olhos D'água Norte – Belo Horizonte/MG – Brasil. CEP: 30390-530

Contact Email: responsabilidade.social@milplan.com.br

CEO: Leonardo Guimarães Mendes

RESPONSIBILITY

Coordination: Bárbara Marques e Nívia Oliveira

Revision:: Marcos Marangoni

GRI Consulting: Ricca Sustentabilidade

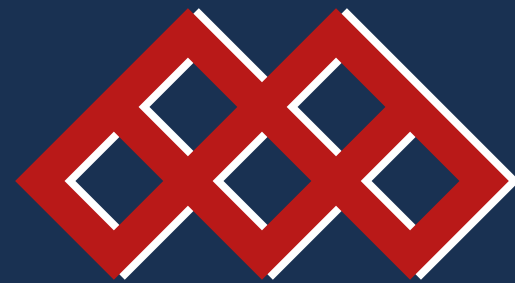
Editorial project and translation: Ricca Sustentabilidade

Graphic design: Ricca Sustentabilidade

Photos: Bruno Gonzaga and MILPLAN archive

CONTRIBUTIONS

Américo Giannetti, Andrei Dupin, André Rezende, Bruno Mafaldo, Daniel Vilaça, Danielle Nunes, Douglas Santos, Dimas Costa, Donizetti Sales, Eduardo Savini, Isabela Pádua, Leandro Leite, Leyzianne Leite, Luiz Bellato, Mônica Veríssimo, Olintho Neto, Paulo Waner, Raphael Zanotti, Rafael Morrison, Tamires Garcia, Ueverton Miranda, Valdinei Otoni, Yolanda Guimarães, Waleska Santos and Willian Furbino.



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