



SUSTAINABILITY REPORT 2025



CONTENTS

1 INTRODUCTION

Letter from the CEO.....4

About this report 6

2 WHO WE ARE

2025 Highlights..... 8

Awards and Recognition 9

Our Presence 11

3 GOVERNANCE

Corporate Governance 15

Organizational Structure 16

Ethics, Integrity and Compliance 22

ESG Commitment and Strategy 27

4 OUR OPERATIONS

Operational and Financial

Performance 30

Efficiency and Innovation 35

Technical Center of Excellence (CET) ...39

5 OUR PEOPLE

Employees..... 46

Occupational Health and Safety 59

Social Investment..... 66

Community Engagement.....75

Human Rights 77

6 ENVIRONMENT

Environmental Management.....79

Emissions and Energy.....81

Water..... 85

Waste and Materials 87

7 ANNEXES

GRI Content Index 92

SASB Content Index 104

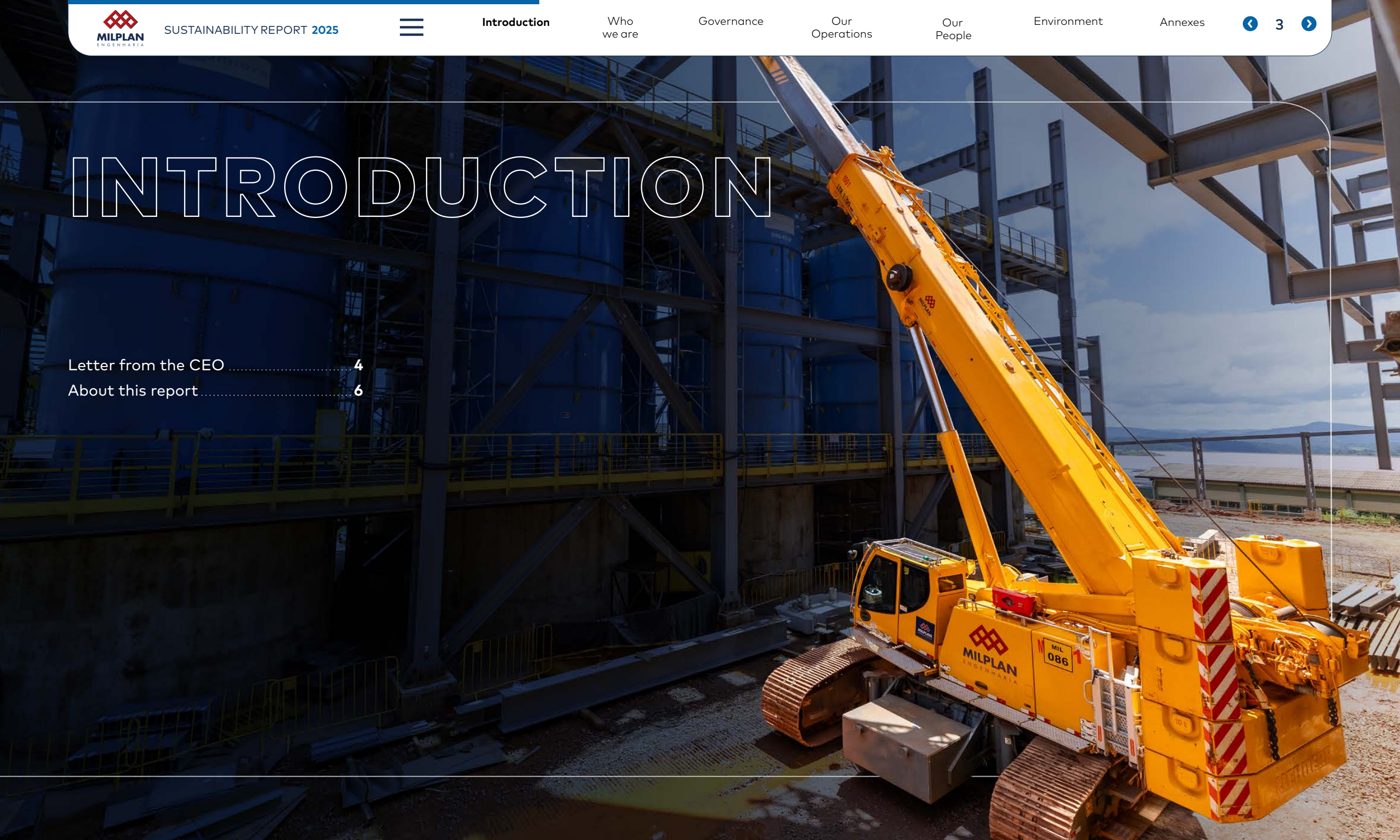
Credits 106



INTRODUCTION

Letter from the CEO 4

About this report 6



LETTER FROM THE CEO

GRI 2-22

The year 2025 marked a period of consolidation and progress for MILPLAN. Against a backdrop of stable business activity and increasing caution in the broader business environment, we focused our efforts on strengthening the foundations that support the Company's growth, making steady progress in governance, people, innovation, and sustainability.

We reinforced our organizational culture, advanced our performance evaluation process, strengthened our people development programs, and enhanced the governance of our committees, which are now more structured and actively engaged. This internal strengthening was also reflected in the advancement of our ESG agenda, including the revision of our ESG Policy, the restructuring of our committees, and improvements to the evaluation process for incentivized projects, bring-

ing greater consistency, clarity, and strategic direction to our initiatives.

At the same time, we maintained a significant role in delivering strategic projects for our clients, expanding our presence in sectors such as energy and oil and gas. These achievements reflect not only our technical expertise, but also our growing capability to manage more complex contracts and diversify our market presence.

In governance and integrity, we advanced our external audit processes and began implementing a new procurement portal designed to strengthen controls and enhance traceability across our supplier value chain. This initiative was structured in 2025, with full implementation scheduled for 2026.

"We continue to strengthen our processes, enhance our internal structures, and advance strategic initiatives that are essential to our sustainable growth, the well-being of our people, and Brazil's development."





Our innovation agenda also gained new momentum throughout the year. We became a supporting partner of C2 Hub, strengthening our connection with the innovation ecosystem and emerging technologies applied to engineering and industrial construction. At the same time, we established the Technical Center of Excellence (*CET*), an initiative that will enable us, over the coming years, to standardize methodologies, enhance the quality of our deliverables, and promote technical knowledge sharing across the Company.

We also reinforced our commitment to safety, which for us is a prerequisite rather than simply a priority. We launched the "*Segurança como Valor*" program, the result of in-depth reflection on the role of leadership in accident prevention. The initiative was created to equip our leaders with the mindset and capabilities needed to ensure that every decision, every guideline, and every operational demand is approached with responsibility and an unwavering commitment to protecting lives.

Although we faced a challenging year in terms of our safety performance, with results falling outside our acceptable thresholds, we continued to strengthen our efforts to ensure that our workplaces become increasingly safer. Safety is, and will always remain, a non-negotiable value at MILPLAN.

The external environment also demanded close attention. Throughout 2025, Brazil experienced a period of significant institutional instability, with noticeable impacts on the pace of decision-making and investment. Even so, I remain optimistic that the country has the capacity for a rapid recovery and that, once these uncertainties subside, new cycles of development will emerge, benefiting the entire industrial and infrastructure value chain.

We closed 2025 with results that exceeded our expectations, operational stability, and significant structural progress. More than the numbers themselves, it was a year dedicated to strengthening the fundamentals that support our growth in a consistent and responsible manner. We enter 2026 prepared for a new stage of maturity, with greater innovation, stronger governance, enhanced safety, and an even greater ability to serve our clients with excellence and responsibility.

I would like to thank everyone who contributed to this year of consolidation. We remain confident that we are building an even stronger and more resilient MILPLAN, prepared to grow with integrity, sustainability, and a steadfast commitment to people.

LEONARDO MENDES
MILPLAN's CEO

ABOUT THIS REPORT

GRI 2-2, 2-3

In its fourth edition, the MILPLAN Sustainability Report presents the Company's progress, challenges, opportunities, and achievements from January 1 to December 31, 2025. Published annually, the report covers financial, environmental, social, governance, and innovation topics, highlighting the Company's key initiatives and progress throughout the year.

The report's structure and content follow the Global Reporting Initiative (GRI) Standards and are aligned with the Sustainable Development Goals (SDGs) that are most relevant to MILPLAN. As an enhancement to its reporting practices, the report also incorporates the Sustainability Accounting Standards Board (SASB) framework for the first time, reinforcing the Company's commitment to the world's leading sustainability reporting frameworks.

The indicators presented refer exclusively to operations under the Company's full control. Information regarding consortiums in which MILPLAN holds an ownership interest is included where relevant but is not incorporated into the reporting boundary for the indicators presented in this report.

For questions or suggestions, please contact us at: responsabilidade.social@milplan.com.br

FRAMEWORKS



Throughout this report, disclosures aligned with the GRI Standards are identified by the notation "**GRI XXX-X**," indicating the topics reported. The GRI framework provides guidance for preparing sustainability reports, enabling MILPLAN to communicate its economic, environmental, and social impacts in a transparent and comparable manner.



This report also includes SASB indicators for the Engineering & Construction Services industry, identified by the notation "**SASB-IF-EN-XXX.X**" throughout the report. These indicators provide relevant information on sustainability topics that may influence the Company's financial performance, offering greater transparency into economically material sustainability factors.



The Company's ESG initiatives and practices are aligned with the 2030 Agenda of the United Nations (UN), which establishes the 17 Sustainable Development Goals (SDGs) encompassing environmental, social, and economic objectives. The SDGs prioritized by MILPLAN and their relationship to the report's content are presented at the beginning of each corresponding chapter.

WHO WE ARE

2025 Highlights	8
Awards and Recognition	9
Our Operations	11



2025 HIGHLIGHTS



Segurança como Valor

Launched in 2025, the *Segurança como Valor* program established safety as a core cultural principle at MILPLAN, fostering reflection, knowledge sharing, and a stronger commitment to protecting lives across the organization.



Strengthening our market presence

We strengthened our presence in the energy and oil and gas sectors through our involvement in highly complex, strategically significant projects, further enhancing our technical and operational capabilities.



C2 Hub

In 2025, MILPLAN entered into a partnership with C2 Hub, reinforcing its commitment to collaboration and the development of innovative solutions through collective intelligence.



2 Million LTI-Free Work Hours

MILPLAN reached the milestone of 2 million work hours without a lost-time injury (LTI)—1 million at the Ouro Preto (MG) project and another 1 million at the Ouro Branco (MG) project. In total, the Company recorded 8,802,311 work hours in 2025.



BRL 4,785,021.00

Invested in social responsibility initiatives.



ESG Committee

The ESG Committee was formally established in 2025 to ensure that MILPLAN's operations remain aligned with the Company's sustainability, ethics, and social responsibility principles.



ESG Policy

MILPLAN's ESG Policy was revised in 2025 to strengthen the Company's strategic direction, reinforce its ESG principles, and establish goals and indicators to monitor progress.



Corporate Volunteer Program

Launched in 2025, the program aims to strengthen collaboration across business areas, increase social engagement, and generate positive impacts in the communities where MILPLAN operates.



People Committee

Created in 2025, the People Committee strengthens people management and organizational culture through a strategic role within MILPLAN.



Technical Center of Excellence (CET) + Process Simplification Committee

The establishment of the Technical Center of Excellence (CET) and the Process Simplification Committee represented an important step in strengthening innovation governance at MILPLAN, promoting greater efficiency, transparency, and excellence in project management and execution.

AWARDS AND RECOGNITION

"Incredible Places to Work 2025"

We were once again recognized in the "Incredible Places to Work" awards—certified by the Fundação Instituto de Administração (FIA) in partnership with Estadão—earning a leading position in the Engineering and Construction category.



Largest industrial assembly companies in Brazil



According to *O Empreiteiro* Magazine ranking, MILPLAN is among the 500 largest engineering companies in Brazil. In 2025, we were recognized as the sixth-largest industrial assembly company in the country.

Outstanding supplier

For the second consecutive year, the MRF Consortium received the Outstanding Supplier Award. Formed by MILPLAN, RETEC Infraestrutura, and Flapa Engenharia, the consortium was recognized by Samarco as the outstanding supplier in Health, Safety, and Environment (HSE) for the 2024/2025 cycle.



Excellence recognition

In February 2025, Project M.441, in Mariana (MG), received the 2024 Outstanding Project Trophy in recognition of its excellence in implementing Lean Construction practices and adopting advanced governance practices.



"Empresa Amiga Seal"



In recognition of our support for the "Maintenance of the Activities of the Mano Down Cultural Center" project, sponsored through Brazil's Federal Culture Incentive Law, MILPLAN received the "Empresa Amiga" Seal in the Outstanding category from the Instituto Mano Down in 2025.

"Gerdau Partner League 2025"

MILPLAN earned a place on the podium in the Gerdau Partner League 2025, ranking **1st** with Project M.444, in Ouro Branco (MG), and **2nd** with Project M.445, in Miguel Burnier, Ouro Preto (MG). The award recognizes outstanding safety performance and excellence in project delivery.



"Ser Humano 2025 Award"



MILPLAN received recognition in three categories at the *Ser Humano* Award 2025, presented by ABRH-MG, one of Brazil's leading awards in people management.

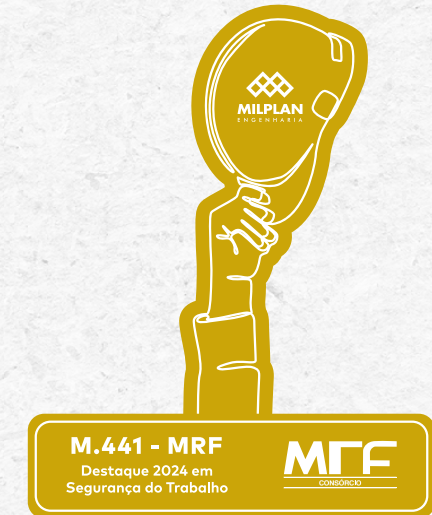
Willian Furbino, Chief Financial Officer, and Marcos Marangoni, People and Management Director, were finalists in the CFO Supporting HR and HR Professional categories, respectively. In addition, the *Mulheres MIL* project earned **second place** in the ESG category, which recognizes sustainability initiatives with a positive impact.

The award recognizes practices, initiatives, and projects that contribute to the advancement of workplace environments, employee well-being, and the sustainability agenda.

"Occupational Safety Excellence Award"

This internal award, presented in 2025, recognizes MILPLAN projects that achieved the best safety performance throughout 2024.

The overall winner was Project M.441, carried out by the MRF Consortium in Mariana (MG), which achieved the remarkable milestone of 2,161,417 work hours without a lost-time injury (LTI).



Great Place to Work (GPTW)



MILPLAN remained Great Place to Work® Certified for the **second consecutive year**, reinforcing its position among the 20 Best Large Companies to Work For in Minas Gerais. This recognition reflects our people's positive perception of MILPLAN's culture and work environment and is the result of the engagement, dedication, and commitment of everyone who contributes every day to building this successful journey.

OUR OPERATIONS

GRI 2-1, 2-6

We are MILPLAN Engenharia S.A., a privately held corporation specializing in industrial construction. For 43 years, we have partnered with Brazil's largest and most prominent heavy industries, making a significant contribution to the development of the sector.

Headquartered in Belo Horizonte (MG), with a branch office in the Northern Region, in Canaã dos Carajás (PA), our purpose is to drive the growth of Brazil's heavy industries by generating a positive impact through safe, efficient, and sustainable operations. Backed by a committed team, we pursue operational excellence, innovation, and tailored solutions, delivering value at every stage of our projects.



In 2025, we operated 10 projects across several regions of Brazil.



PURPOSE

To build a better and sustainable Brazil



VISION

Achieve excellence in industrial projects, with transformative people



BUSINESS

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



VALUES

- Safety
- Ethics
- Collaboration
- Simplicity
- Customer focus
- Results orientation

Our service portfolio is focused on the heavy industries sector, with a strong presence across several of Brazil's key industries. We are recognized for our flexibility and technical excellence, tailoring our solutions to the specific needs of each client and project.

This integrated approach across the industries we serve, the services we provide, and the contract types we offer demonstrates our ability to deliver comprehensive solutions and contribute meaningfully to the success of the projects we undertake.



OUR PRESENCE

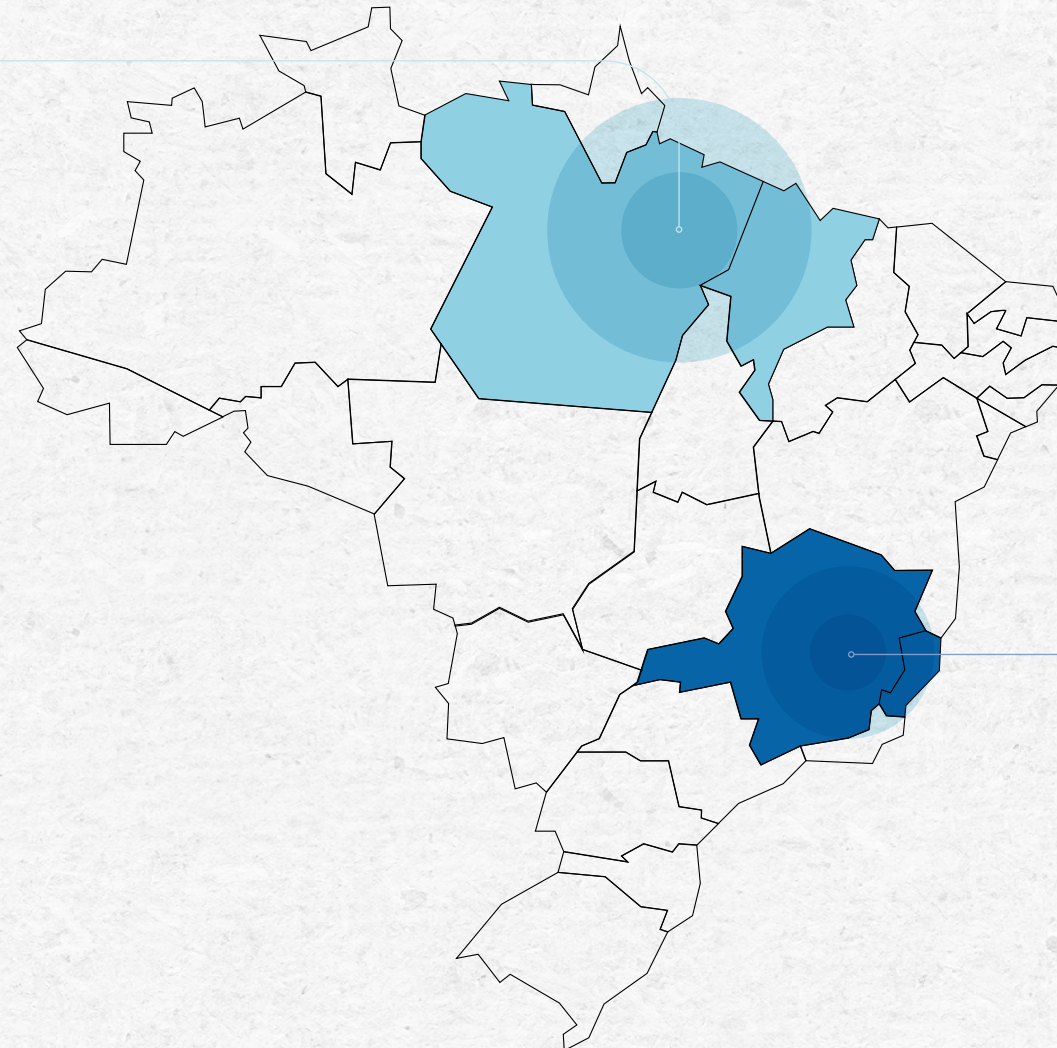
GRI 2-1, SASB IF-EN-000.A, IF-EN-000.B

NORTH

-  **M.440** -Electromechanical assembly of equipment, substations, steel structures, platework, and auxiliary systems in Canaã dos Carajás (PA)
-  **M.449** -EPC contract in Santo Antonio dos Lopes (MA)
-  **M.450** - Electromechanical assembly in Parauapebas (PA)
-  **M.443** – Civil works for electromechanical assembly in Canaã dos Carajás (PA)

 **Completed**

 **Ongoing**



SOUTHEAST

-  **M.444** - Electromechanical assembly and railway terminal construction in Ouro Branco (MG)
-  **M.445** -Electromechanical assembly and civil construction in Ouro Preto (MG)
-  **M.446** - Structural dismantling and rehabilitation in Anchieta (ES)
-  **M.447** - Civil construction and electromechanical assembly in Conceição do Mato Dentro (MG)
-  **M.448** - Civil construction and electromechanical assembly in Tapira (MG)
-  **M.419** (Consortium) – Earthworks and civil construction in Mariana and Ouro Preto (MG)
-  **M.439** -Electromechanical assembly in Ouro Branco (MG)
-  **M.441** (Consortium) – Infrastructure, civil construction, and electromechanical assembly in Mariana (MG)

GOVERNANCE

Corporate Governance	15
Organizational Structure	16
Ethics, Integrity and Compliance	22
ESG Commitment and Strategy	27

Sustainable Development Goals (SDGs):



CORPORATE GOVERNANCE

GRI 2-9

We operate in accordance with principles that guide our business governance and decision-making. These foundations underpin our operations and reinforce our commitment to creating sustainable long-term value.

Since 2007, we have partnered with Fundação Dom Cabral (*FDC*) to support the continuous development and evolution of our management and governance model. Our governance structure is aligned with market best practices and is continuously enhanced. Our governance model is formalized and comprises the Shareholders' Meeting, the Board of

Directors, the Executive Board, and their respective committees, ensuring strategic alignment, performance oversight, and the effective execution of corporate guidelines.

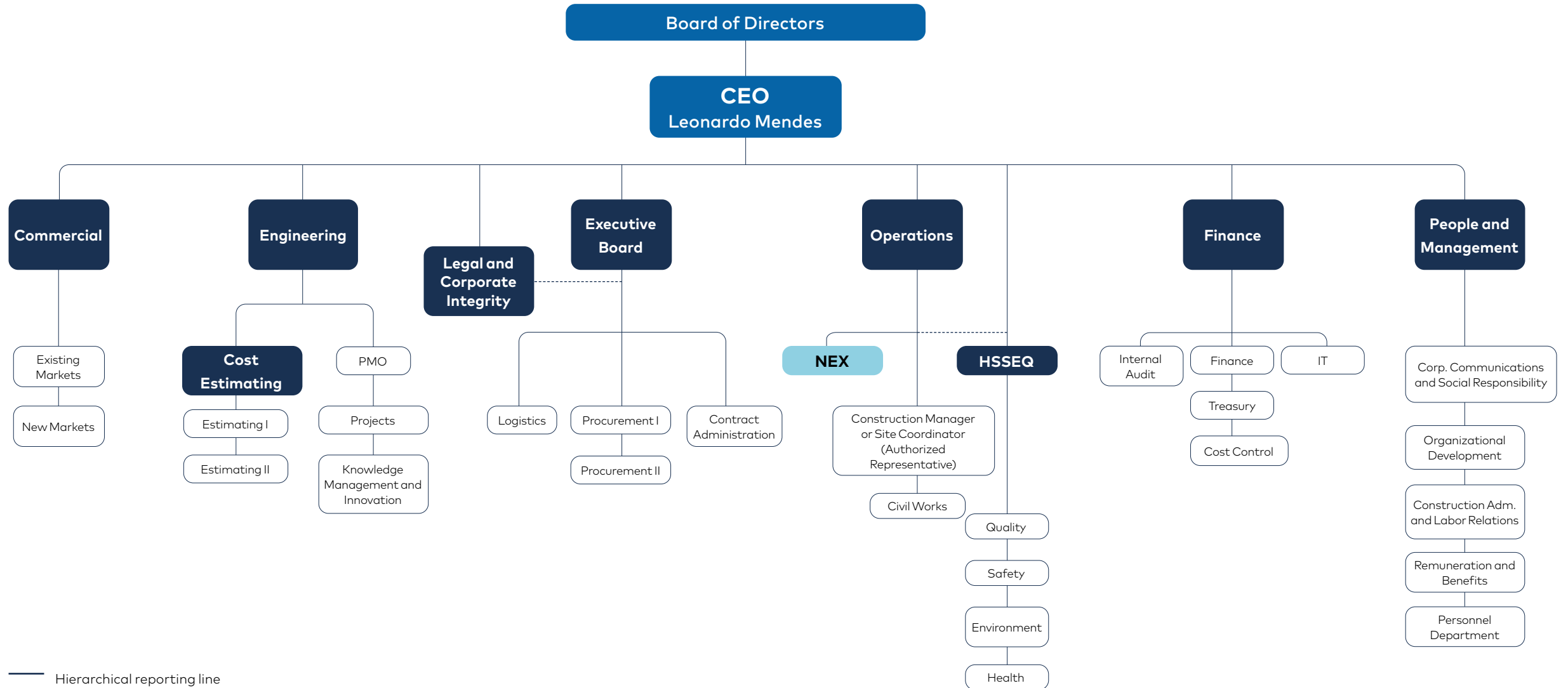
We are also supported by an independent external auditor, who reviews our financial statements and assesses the effectiveness of our internal controls, ensuring the reliability of financial information and strengthening transparency.

Strategic decisions are supported by formal committees, established governance processes, and independent controls, promoting greater transparency, accountability, and operational efficiency.



ORGANIZATIONAL STRUCTURE

GRI 2-9



BOARD OF DIRECTORS

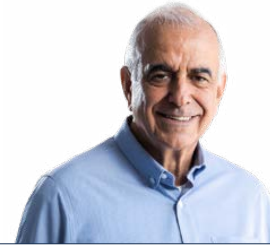
GRI 2-9, 2-10, 2-11, 2-12, 2-13, 2-17, 405-1

The Board of Directors is responsible for establishing strategic guidelines, evaluating governance practices, and overseeing MILPLAN's performance. It approves and oversees the Company's purpose, values, and policies, ensuring alignment with its long-term objectives.

Board members are elected by the Shareholders' Meeting based on an assessment of the competencies required. The selection process considers the Company's context, industry needs, the maturity of its governance framework, market trends, and the candidates' technical expertise and leadership capabilities. Board members serve one-year terms and are eligible for reelection.

The Board of Directors retains strategic oversight and ultimate decision-making authority over ESG impact management while delegating the implementation of initiatives to the ESG Committee, ensuring clear accountability and effective governance of MILPLAN's economic, environmental, and social impacts.

Board compensation is governed by a policy approved by senior leadership and informed by market benchmarking and comparative studies. The compensation package includes fixed compensation, variable compensation, and performance-based bonuses.



Alencar Filho
Board Member



Leonardo Mendes
CEO and Board
Member



Germana Giannetti
Board Member



Marcelo Filho
Independent
Board Member



José Eduardo Quintella
Chair and Independent
Board Member (does
not hold executive
responsibilities within
the Company)



CORPORATE INTEGRITY COMMITTEE

GRI 2-9

The Corporate Integrity Committee is primarily responsible for discussing and making decisions on compliance and risk management matters, ensuring that all MILPLAN operations adhere to the highest ethical and legal standards.

Committee members are elected to one-year terms. The Committee meets monthly and is responsible for reviewing reports and suggestions submitted through the Ethics Channel, with particular attention to violations of the Code of Conduct and other situations that may pose risks to the Company and its stakeholders. The Committee is also responsible for reviewing and updating the Corporate Risk Matrix, reinforcing its critical role in identifying, preventing, and mitigating risks.



Germana Giannetti
Board and
Committee Member



Leonardo Mendes
CEO and
Committee
Member



Mônica Veríssimo Legal
Manager, Compliance
Officer, and Committee
Member

PEOPLE COMMITTEE

GRI 2-9

Established in 2025, the People Committee is an advisory body that supports the Executive Board and the Board of Directors on strategic matters related to people management and organizational culture. As a strategic, non-decision-making body, it provides analyses and recommendations to support decision-making on topics such as People Management indicators, leadership development and succession planning, organizational culture, employee engagement, and diversity, equity, and inclusion (DE&I).

Its composition reflects the integration of different levels of the Company's governance structure, bringing together members of the Executive Board, the Board of Directors, and the People and Management area, who serve one-year terms.

The Committee meets at least quarterly and reports regularly to the Board of Directors, ensuring strategic alignment and contributing to the continuous improvement of people management practices.



Alencar Filho
Board and Committee Member



Leonardo Mendes
CEO and Committee Member



Eduardo Savini
Operations Director and Committee Member



Marcos Marangoni
People and Management Director and Committee Member



ESG COMMITTEE

GRI 2-9, 2-14, 2-17

In 2025, MILPLAN strengthened its ESG Committee as a strategic advisory body supporting senior leadership in establishing and monitoring environmental, social, and governance guidelines. In an advisory capacity, the Committee ensures that the Company's operations remain aligned with the principles of sustainability, ethics, and social responsibility.

Throughout the year, the Committee was responsible for proposing ESG goals and initiatives, monitoring compliance with applicable legislation and commitments, overseeing risks and opportunities, evaluating performance indicators, and recommending continuous improvements. It also promoted the integration of the ESG agenda across the Company, fostering innovation, capacity building, and transparency in the information disclosed in the Sustainability Report.

Composed of permanent members from different areas of the Company appointed by senior leadership, the Committee meets monthly to deliberate on strategic matters and issue recommendations to the Executive Board and the Board of Directors.



Bárbara Oliveira
Communication and Social
Responsibility Coordinator and
Committee Member



Donizetti Sales
Executive QHSE Manager and
Committee Member



Mônica Veríssimo
Legal Manager, Compliance
Officer, and Committee Member

Cristiana Mendes
Committee Member



PROCESS SIMPLIFICATION COMMITTEE

GRI 2-9

The Process Simplification Committee is responsible for driving innovation, operational efficiency, and digital transformation at MIL-PLAN. It operates through an integrated, multidisciplinary approach, bringing together representatives from different strategic areas of the Company.

Its primary responsibilities include identifying and prioritizing opportunities to improve processes, systems, and operations; evaluating innovation initiatives and their impact on business performance and sustainability; and promoting studies and best practices for implementation at construction sites and the Company's headquarters.

The Committee Chair is appointed by the Board of Directors and is responsible for nominating the remaining members, whose appointments are also subject to the Board's approval. Composed of representatives from the Board of Directors, the Executive Board, and key business areas, the Committee brings together diverse perspectives and expertise to strengthen the quality of its analyses and decision-making.



Daniel Vilaça
Engineering
Director and
Committee
Chair



Américo Giannetti
Construction
Manager and
Committee
Member



Donizetti Salles
Executive
QHSE Manager
and Committee
Member



Eduardo Savini
Operations
Director and
Committee
Member



**José Eduardo
Quintella**
Board Member
and Committee
Member



Luiz Bellato
PMO Specialist
and Committee
Member



Matheus Mata
Construction
Manager and
Committee
Member



Maikon Bonomi
IT Manager and
Committee
Member



ETHICS, INTEGRITY AND COMPLIANCE

GRI 3-3, 2-15, 2-23, 2-24, 2-26, 205-2, SASB IF-EN-510a.3

We operate with diligence, ensuring compliance with applicable legislation and the principles set forth in our Bylaws, which reinforce an organizational culture built on transparency, respect, and trust.

This commitment is supported by our compliance and governance framework, which comprises the instruments and bodies that guide and oversee the integrity of our processes, including:

- **Corporate Integrity Program**
- **Code of Conduct**
- **Corporate Integrity Committee**
- **Corporate Risk Matrix**
- **Ethics Channel**

To prevent and manage conflicts of interest, we have established clear, formal guidelines that govern the identification, reporting, and resolution of such situations. These include our Code of Conduct, which sets the standards for ethical and transparent professional conduct.

When conflicts of interest are identified, senior leadership is directly responsible for addressing them. This approach is complemented by mechanisms such as employee declarations of potential conflicts of interest, segregation of duties, and oversight by the Board of Directors. The Ethics Channel plays a central role in this process by providing a secure and confidential means for reporting situations that may pose risks to the Company's integrity.

We also invest in the ongoing development and education of our teams through initiatives such as the "**Ligado no Compliance**" program, our Compliance Awareness Program, which strengthens understanding of ethics, integrity, corruption, and conflicts of interest while encouraging the practical application of these principles in day-to-day activities.

Integrity, compliance, and risk management are the cornerstones of our governance model.



Complementing this framework, the Corporate Risk Matrix serves as the Company's primary tool for identifying, assessing, and monitoring risks that may affect its operational and strategic objectives. Based on the dimensions of likelihood and impact, the Matrix enables risks to be classified and prioritized through a struc-

tured approach. It is overseen by the Corporate Integrity Committee and reviewed periodically—at least once a year—to ensure its alignment with the business context and support the continuous improvement of risk management.



LIGADO NO COMPLIANCE

GRI 205-2

One of the highlights of 2025, the "Ligado no Compliance" program, our Compliance Awareness Program, brings MILPLAN's values to life by promoting monthly sessions designed to discuss everyday situations and reinforce the pillars of the Company's Corporate Integrity Program.

These sessions cover topics such as conflicts of interest, the Code of Conduct, expected behaviors, and other issues that are essential to fostering a strong culture of ethics and compliance across the Company.

The program is guided by a commitment to acting proactively, collaboratively, and in alignment with the Company's values, supporting more informed, responsible, and sustainable decision-making.

CODE OF CONDUCT

GRI 205-1, 205-2, 205-3, SASB IF-EN-510a.3

MILPLAN is committed to building trust across its entire network of relationships. This commitment is formalized through its Code of Conduct, which reflects the Company's standards, culture, purpose, vision, and values.

Serving as a guide to the ethical conduct expected of all employees and service providers, the Code is founded on core values such as integrity, transparency, honesty, respect, collaboration, trust, and sound judgment.

Compliance with the Code of Conduct is mandatory for everyone at the Company, regardless of their role or responsibilities. From the onboarding process onward, all employees receive training on the Code of Conduct, covering the Company's guidelines on ethics, integrity, and anti-corruption. Throughout the year, this training is reinforced through monthly initiatives such as the "*Ligado no Compliance*" program. For suppliers and business partners, anti-corruption commitments are formalized through contractual clauses requiring compliance with the guidelines set forth in MILPLAN's Code of Conduct.

Corruption risk assessments are conducted across 100% of the Company's operations. During the reporting period, no confirmed cases of corruption involving the Company were recorded.

TRAINING AND AWARENESS

A healthy, safe, and respectful workplace begins with knowledge and active listening. To support this commitment, MILPLAN promotes open dialogue with its teams and provides

regular training on topics such as civil and criminal liability, workplace harassment, and sexual harassment.

These training initiatives are designed to clarify questions, reinforce internal guidelines, and strengthen a culture of mutual respect and integrity across all work environments.



ETHICS CHANNEL

GRI 2-16, 2-25, 2-26

We provide an independent, third-party reporting channel designed to ensure the anonymity of individuals submitting reports and the impartial handling of all cases. The Ethics Channel is one of the Company's primary mechanisms for identifying misconduct that may violate the principles set forth in the Code of Conduct and the Company's corporate integrity practices.

Reports are reviewed by the Corporate Integrity Committee, which assesses the information received, determines the appropriate course of action, ensures that each case is properly addressed, and escalates matters to the Executive Board or the Board of Directors, as appropriate, based on their materiality.

The Ethics Channel follows a formal process involving all areas of the Company to gather relevant information and ensure reports are handled efficiently. This mechanism is essential to promoting transparency, impartiality, and confidentiality throughout the investigation process.

HOW THE ETHICS CHANNEL WORKS

a) The channel receives reports of potential unethical conduct involving the Company's entire network of relationships, both internal and external.

b) Reports may be submitted through the website, telephone, or mobile app using *Contato Seguro*, an independent third-party platform. The platform forwards all reports to the Corporate Integrity Committee for review.

c) A wareness of the Ethics Channel is promoted through the MILPLAN website, banners, informational materials, internal campaigns, and newsletters, ensuring that all employees and stakeholders are aware of its availability and how it operates.

d) The Corporate Integrity Committee appoints an investigator to examine each report. Following the investigation, the Committee determines the appropriate corrective actions and monitors their implementation until the matter is resolved.

In addition to the Ethics Channel, we maintain an internal ombudsman channel called Zé MIL, which provides a dedicated space for submitting suggestions, requesting information, and filing complaints. The channel encourages employees to openly share their opinions and concerns.

The People and Management team is responsible for actively listening to the reports received, assessing each submission, and providing responses through the Company's internal communication channels. Reports may

be submitted anonymously, and all information is handled with strict confidentiality to protect the privacy of everyone involved.

We also maintain a Consequence Management Policy, which establishes the criteria and procedures to be followed in cases of misconduct, including violations of the Code of Conduct, the Golden Rules, or other Company policies and guidelines.

This policy ensures that all cases are addressed fairly, transparently, and in accordance with the Company's ethical values and established guidelines.

ACCESS OUR ETHICS CHANNEL



Phone number: 0800 517 0001



website: www.contatoseguro.com.br/milplan



App: *Contato Seguro*

Calls are toll-free from anywhere in Brazil, and trained specialists are available 24 hours a day, seven days a week, throughout the year.

2025 CASE MANAGEMENT INDICATORS

GRI 2-25

119
reports received
in 2025

STATUS

51
Substantiated

44
Unsubstantiated

14
Partially substantiated

5
Inconclusive

4
Outside the scope of the
Ethics Channel

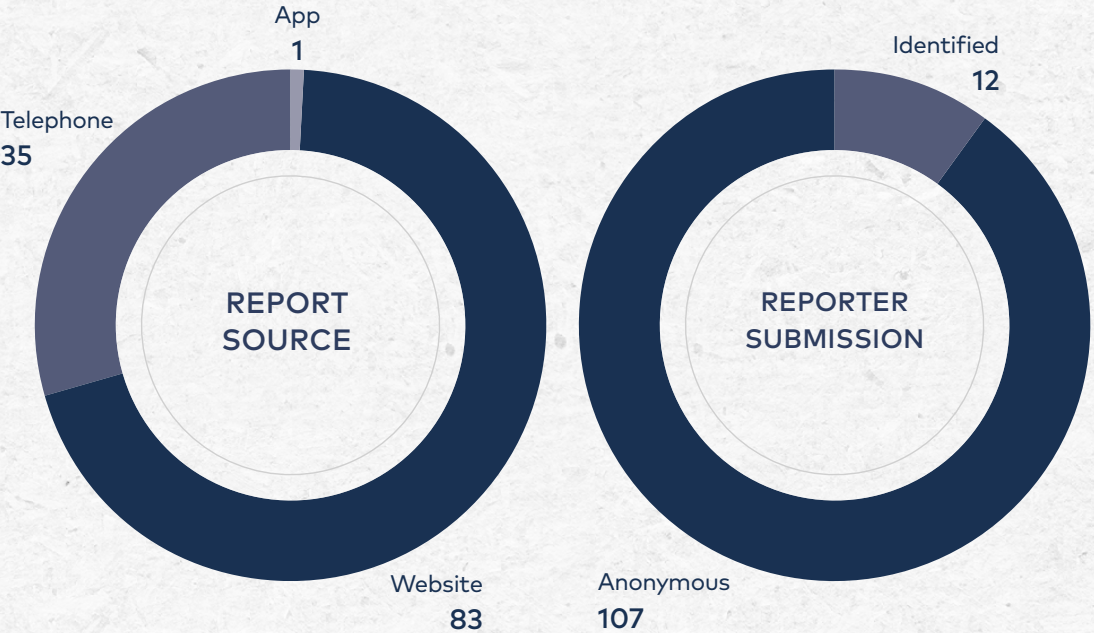
1
Closed

LOCATION OF THE INCIDENT

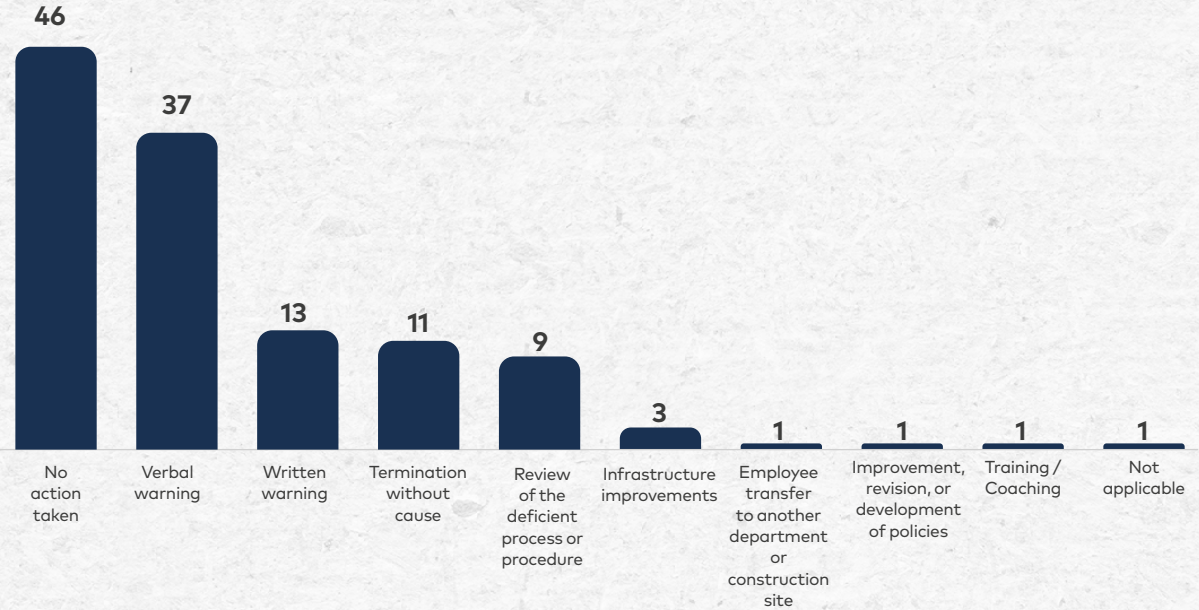
10
Northern
Branch

12
Headquarters

97
Construction
sites



ACTIONS TAKEN / OUTCOMES*



* A single report may result in more than one action, which explains the total of 123 actions recorded in 2025. As of December 2025, four reports remained under investigation.

ESG COMMITMENT AND STRATEGY

GRI 2-22, 2-24

In 2025, MILPLAN advanced its sustainability agenda by revising its **ESG Policy**, reinforcing its commitment to its corporate purpose of "Building a Better and More Sustainable Brazil."

The Policy was developed and updated to ensure the sustainable viability of the business in the short, medium, and long term while establishing guidelines for strategic, tactical, and operational decision-making aligned with the Company's values, the expectations of the market and society, and leading internationally recognized standards and frameworks.

The initiative aims to consolidate and promote ESG principles, criteria, and practices across the Company, while establishing goals and performance indicators to monitor their effectiveness and continuous improvement. These goals are directly aligned with the Sustainable Development Goals (SDGs) prioritized by MILPLAN.

The ESG Policy applies to the Company's Headquarters, Northern Branch, and all construction sites. It also guides the Company's relationships with its stakeholders, including clients, employees, shareholders, suppliers, communities, labor unions, and government authorities. Its implementation and oversight are led by the QHSE Department, with the support of the ESG Committee.



MATERIALITY

GRI 3-1, 3-2

In 2023, we carried out our materiality assessment process, which serves as the foundation for the preparation of our Sustainability Report. The objective was to identify the topics most relevant to the Company and its stakeholders, taking into account the actual and potential impacts of our operations.

The assessment involved 55 employees from different business areas and organizational levels. We also conducted a sector analysis to identify the industry's key challenges and market trends. Based on the information gathered, the material topics were organized into ESG pillars (Environmental, Social, and Governance) and prioritized according to their strategic relevance.

For the next reporting cycle, we plan to update and review our materiality assessment to provide a refreshed perspective on our business, aligned with current dynamics and emerging challenges. In doing so, we aim to ensure that our material topics continue to reflect our current priorities.

The priority topics that guided our actions and the development of this report are presented in the infographic alongside.



**Occupational
Health and Safety**



**Ethics and
Compliance**



**Human
Rights**



**Environmental
Management**



**Talent Attraction
and Retention**



**Community
Engagement**



**Economic
Performance**



Decarbonization

OUR OPERATIONS

Operational and Financial Performance 30

Efficiency and Innovation 35

Technical Center of Excellence (CET) 39

Sustainable Development Goals (SDGs):



OPERATIONAL AND FINANCIAL PERFORMANCE

FINANCIAL PERFORMANCE

GRI 3-3, 201-1

In 2025, MILPLAN delivered strong financial performance, exceeding the target established in its strategic plan by 62%. This achievement reflects a series of initiatives aimed at strengthening management practices and improving operational efficiency. Key contributors included the expanded use of digital tools for cost control and monitoring, shorter turnaround times for monthly reporting, and the simplification of internal processes.

These results were supported by a structured performance monitoring routine that enabled a comprehensive assessment of strategic indicators across financial performance, market position and reputation, technology, organizational effectiveness and processes, and human capital.

Despite these positive results, the year also brought challenges that required process improvements and operational adjustments. These included ensuring adequate workforce availability for construction sites, optimizing procurement negotiations, improving employee benefits administration, and restructuring the logistics function. Together, these achievements and challenges reflect MILPLAN's continued focus on creating value while maintaining the strength and sustainability of its results.

STATEMENT OF VALUE ADDED (BRL THOUSAND) - GRI 201-1

	2023	2024	2025
Revenue	1,148,629	1,139,269	1,266,988
Third-party inputs	524,168	505,461	365,503
Gross value added (1-2)	624,461	633,808	901,485
Depreciation and amortization	0	0	10,856
Net value added generated (3-4)	624,461	633,808	890,629
Value added received through transfer	0	0	32,576
Total value added to distribute (5+6)	624,461	633,808	923,205

Distribution of value added	491,303	525,449	923,205
Personnel costs	376,388	410,710	561,910
Taxes, fees and contributions	97,666	92,995	184,457
Interest expense and lease payments	4,949	5,744	12,740
Remuneration of own capital	12,300	16,000	164,098

OPERATIONAL PERFORMANCE

Throughout the year, our operations remained focused on Brazil's main heavy industry segments, with a strong presence in EPC (Engineering, Procurement and Construction) projects and continued progress in the execution of highly complex projects.

The period was challenging, but it also brought significant advances in consolidating our operational structure. These advances were driven by investments in technology, innovation, asset modernization, organizational restructuring, and the strengthening of our technical teams, expanding our delivery capacity.

In Canaã dos Carajás, Para, we implemented engineering solutions that enabled a high degree of pre-assembly, including the jacking of the CTs, the transport of structures using self-propelled modular transporters (SPMTs), and installation using heavy-duty equipment, such as 250-metric-ton lattice boom cranes. These solutions streamlined project execution, improving both operational efficiency and safety during the transport and installation stages.

In Anchieta, Espírito Santo, productivity exceeded expectations during the dismantling and installation work carried out in Pelletizing Areas 1 and 2 at the Ubu Plant. Delivery effectiveness and quality exceeded the performance target established in the contract by 60%. This

result was supported by management routines, including productivity review meetings and the use of digital monitoring tools.

We also invested in renewing our equipment fleet, further aligning operational efficiency with our ESG commitments. With an investment of approximately BRL 19 million, replacing older assets with more modern and efficient equipment is helping reduce greenhouse gas emissions, fuel consumption, and waste generation, while mitigating leak risks and raising standards of safety, reliability, and productivity. The initiative has also reduced equipment failures, unplanned downtime, and maintenance costs, while providing better working conditions for our teams.

The results achieved during the year also led to important recognition. The Anchieta project completed 100% of its deliverables on schedule and to a high quality standard, earning MILPLAN's 2025 Project Governance Award. We were also recognized by the 2025 Gerdau Partner League, an award that highlights safety best practices and demonstrates that effective occupational health and safety management also contributes to higher levels of quality, efficiency, and operational reliability.

Throughout the year, our projects recorded 8,802,311 hours worked, reflecting the scale of our operations and the commitment of our teams.





OPERATIONAL GOVERNANCE AND INTERNAL COLLABORATION

As part of its continuous improvement strategy, MILPLAN established seven operational efficiency working groups in 2025, led by the Operations Director. Working across functions, these groups fostered collaboration among different areas while generating insights based on operational challenges and identified opportunities. The priority areas addressed by the working groups included:

- **Sustainability**
- **Productivity**
- **Safety and Productivity**
- **Process Innovation**
- **Cost Management and Safety**
- **Cost Management, Productivity and Safety**

MILPLAN's performance throughout the year reflected its ability to adapt, maintain operational discipline, and continuously improve, with a strong focus on efficiency, innovation, and cross-functional collaboration.

SUPPLY CHAIN MANAGEMENT

GRI 2-6

Our supply chain management is guided by technical, operational, and governance criteria. We seek to build long-term partnerships with our suppliers, fostering collaboration and trust throughout the value chain.

Our supplier base spans a wide range of categories that are essential to project execution, including specialized technical services across multiple disciplines (civil, electrical, mechanical, and automation), indirect support services (transportation, accommodation, catering, and employee benefits), and the supply of materials and equipment, ranging from off-the-shelf products to highly specialized items with stringent technical requirements.

In 2025, our active supplier base comprised 2,121 partner companies, primarily based in Brazil, as well as international suppliers, particularly from China and Canada. During the year, 709 new suppliers were added to our supplier base.

We also restructured our Procurement function with the support of an external consulting firm. As part of this initiative, we estab-

lished a dedicated Contract Administration department that works closely with the Planning and PMO teams, strengthening operational support and enhancing contract management, including supplier performance measurement and client interface activities.

Our internal contract management platform was also enhanced through the standardization of contract templates developed jointly by the Legal and Contract Administration teams, increasing legal certainty and ensuring consistency across contracting processes.

As part of the continued advancement of governance practices across our value chain, we began developing our Supplier Code of Conduct in 2025, with publication scheduled for 2026. The document will establish clear guidelines on ethics, integrity, legal compliance, and social and environmental responsibility, further strengthening our strategic relationships with suppliers.





GRI 204-1

We remain committed to creating value in the regions where we operate by prioritizing, whenever possible, the procurement of goods and services from local suppliers. We define local suppliers as those located near our operational units. In major urban centers, this includes companies based within the respective metropolitan area. In more remote locations, local suppliers are defined as those located in the nearest municipalities with the infrastructure required to meet project demands.

In 2025, 46.7% of the suppliers contracted during the year were local suppliers.

Spending with local suppliers			
	2023	2024	2025 ¹
Amounts in BRL			
Spending with local suppliers	BRL 139,515,116	BRL 106,289,347	BRL 186,199,913
Total spending with suppliers	BRL 717,967,058	BRL 402,873,354	BRL 562,437,784
Percentage of spending with local suppliers	19%	26%	33%

¹ Beginning in 2025, the analysis of spending with suppliers was expanded to cover 100% of the Company's operations, including Headquarters, the Sao Paulo Branch, the Northern Branch, and construction sites.

EFFICIENCY AND INNOVATION

METHODOLOGY AND PROCESSES

Over the past few years, our innovation journey has continued to gain momentum, reaching a new level with the consolidation of the Project Management Office (PMO), which has become one of the Company's strategic pillars.

The PMO is organized into two complementary functions: the Projects and Construction Governance team, responsible for standardizing, planning, and monitoring project activities, and the Knowledge Management and Innovation (GCI) team, which promotes organizational learning, drives continuous improvement, and leads innovation initiatives. Key achievements include the consolidation of methodologies such as Advanced Work Packaging (AWP) and Building Information Modeling (BIM), as well as Lean Construction practices, which are transforming the way projects are planned and executed.

The PMO structure also includes MILPLAN Business Partners (BPs), experienced professionals who serve as stra-



tegic advisors, aligning project objectives with the Company's business goals. The PMO is also responsible for centralizing information through the Information Hub.

In 2025, we further strengthened our Knowledge Management and Innovation (GCI) function through initiatives aimed at promoting knowledge sharing and establishing an organizational environment focused on continuous improvement. One of the year's key milestones was the creation of the Technical Center of Excellence (CET), which brings together BIM and Business Intelligence (BI) capabilities to standardize practices, develop technological solutions, and support projects in the strategic use of data and digital tools. Scheduled to begin operations in January 2026, the CET will serve as a corporate center for technical support and applied innovation, contributing to operational efficiency and greater integration across the organization.

Knowledge management was also strengthened through the consolidation of initiatives such as the *Ponte de Ideias*

and *Banco de Lições Aprendidas* programs, which reached a record number of entries during the year. Internal communication and learning channels were also expanded, including PMO Check Point, which regularly shares guidelines, technical content, and key learnings across the Company.

Among our learning initiatives, the "60 Minutes of Value" stands out, a monthly forum that brings together planning leaderships for technical discussions and the exchange of best practices. In partnership with the Projects team, learning pathways were also developed on the *Desenvolver* Platform, covering different leadership levels and incorporating the PMO's work instructions.

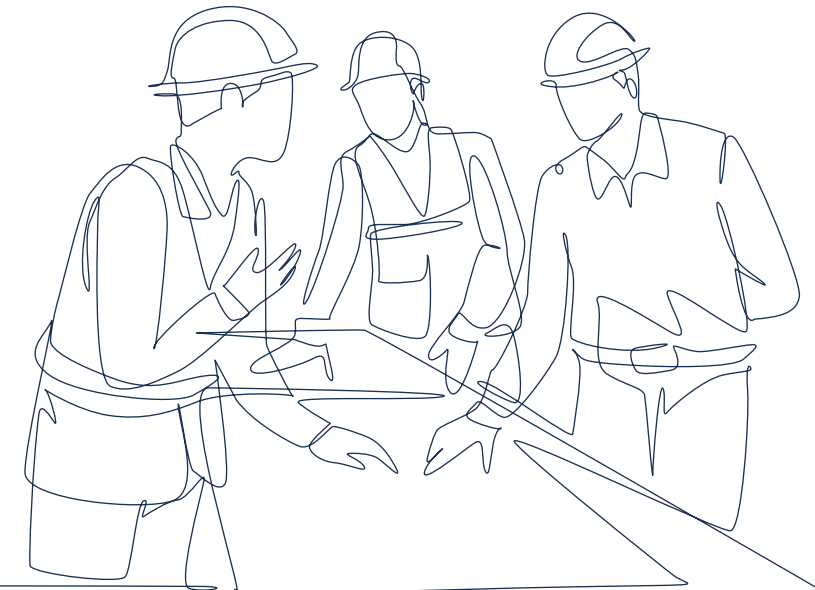
We also advanced our data governance initiatives and further strengthened our data-driven culture by enhancing data management practices, developing dashboards, and integrating information hubs, increasing transparency, analytical capabilities, and the quality of project decision-making.

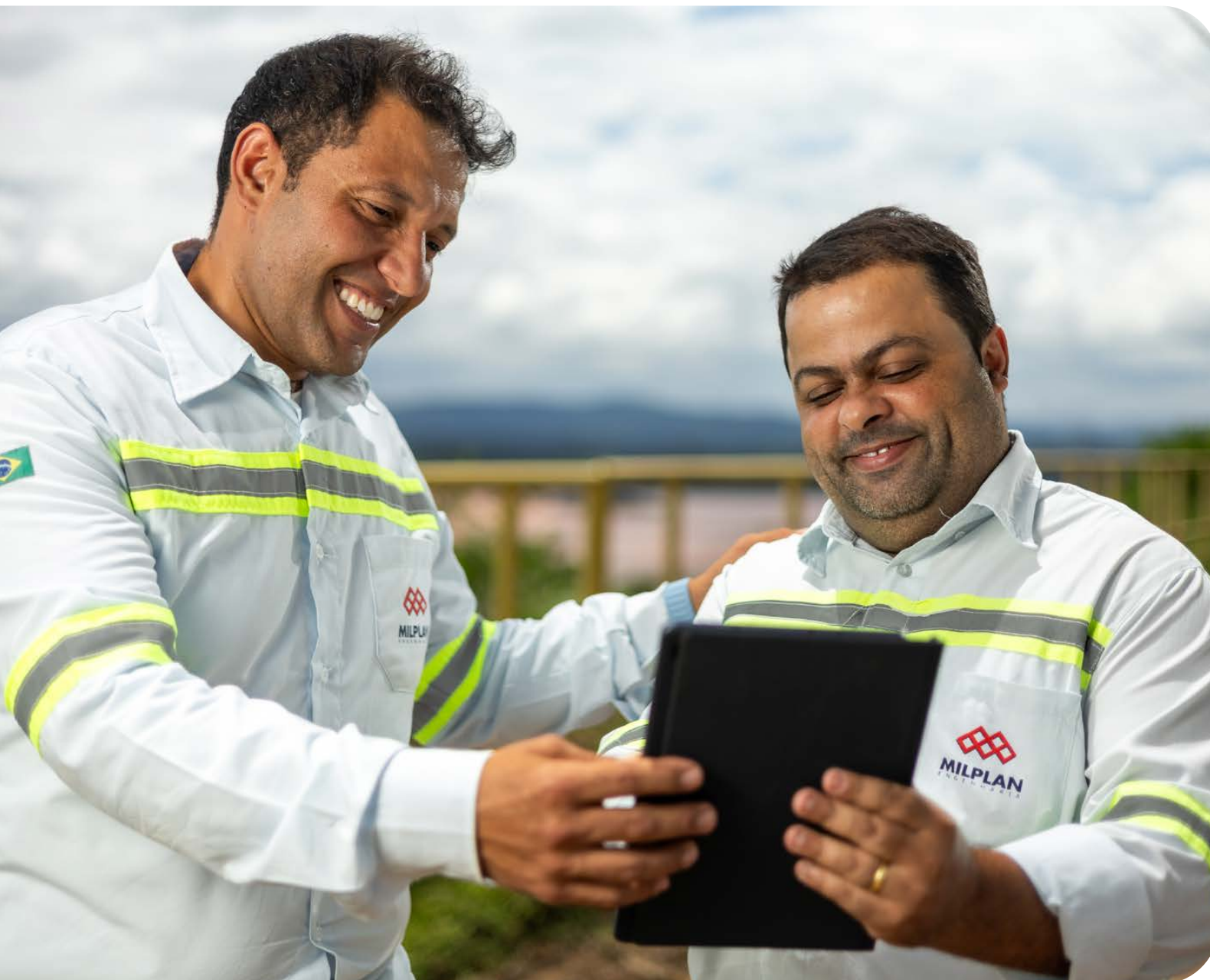
To further reinforce our culture of innovation, we established the Process Simplification Committee, focused on improving process efficiency and implementing solutions that foster greater integration and collaboration across the organization.

The year marked an important step toward building a more learning-oriented and innovation-driven organization. Although these initiatives are being implemented progressively, they have established a solid foundation for expanding the use of technology, data, and knowledge as drivers of productivity, competitiveness, and value creation.

The following highlights showcase our key advances in technologies and processes:

Investing in innovation reflects our commitment to engineering excellence and to the continued development of Brazil's heavy industry, helping build a more sustainable future.





INFORMATION HUB

The Information Hub is an integrated corporate platform used to monitor KPIs across all construction sites. In 2025, its capabilities were expanded with the implementation of the Cost Hub, a new module featuring analytical dashboards designed to support project value management, incorporating predictive analytics and integrating data from multiple business areas and corporate systems.

This enhancement strengthens financial monitoring and forecasting capabilities, enabling earlier identification of variances and more informed decision-making.

SIMOVA

We continued advancing the digitalization of operational controls through SIMOVA, our digital timekeeping system for construction sites. The solution enables the structured recording of field activities, ensuring greater accuracy, traceability, and data reliability.

The system provides real-time operational visibility, as information is entered during task execution and made immediately available for analysis. This approach enhances oversight of field performance and supports faster, data-driven decision-making. The process is managed by construction site supervisors, who ensure the accuracy and quality of the information recorded.

BANCO DE LIÇÕES APRENDIDAS

It was created to capture, consolidate, and disseminate best practices and solutions developed across projects, promoting knowledge sharing and operational efficiency. During the year, a quarterly communication process was established to share these lessons across the Company through the PMO Moment during Quarterly Construction Meetings and the CheckPoint PMO channel.

As part of its continuous improvement, the procedure was revised to include the structured identification of lessons learned during the project mobilization phase. As a result, new projects now identify and classify relevant lessons in the system according to project scope, client, and business area, making them easier to retrieve and apply.

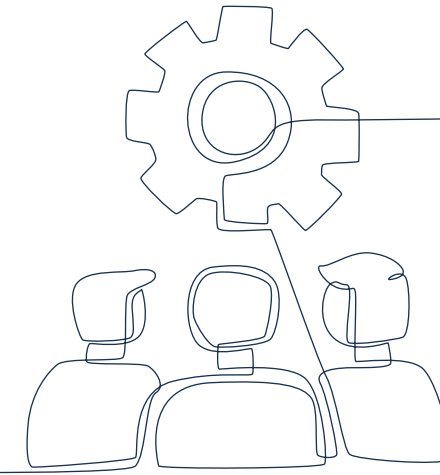
The system was also enhanced with new categorization fields, including scope, lesson type, potential for reuse, and impact, improving searchability and analysis while further strengthening knowledge management.

PONTE DE IDEIAS

This is an ongoing initiative designed to identify, document, and disseminate solutions developed across projects that have the potential to be applied to other construction sites. The program encourages the sharing of best practices, operational improvements, and standardized approaches.

Submitted ideas undergo a curation process led by the Knowledge Management and Innovation (GCI) team in collaboration with the originating business areas. Each idea is organized, documented, and assessed for its replication potential and value creation. When appropriate, ideas are incorporated into standardized corporate practices and processes, extending their impact across the Company.

To date, 10 initiatives have been registered, most of them focused on improving support and management processes. During the first half of 2026, the Company plans to launch a dedicated digital platform for sharing these practices, further expanding access to knowledge and fostering collaboration among employees.



In 2025, **57 new lessons learned** were approved.

The Company also reached the milestone of **100 approved lessons** learned since the program was launched.

To celebrate this achievement, a special edition of CheckPoint PMO was dedicated to highlighting the importance of the initiative and recognizing the Construction Manager who contributed the highest number of lessons recorded in the system.

TECHNICAL **CENTER** OF EXCELLENCE (*CET*)

The Technical Center of Excellence (*CET*) was established to support MILPLAN's projects through two complementary functions: the BIM Center and the Business Intelligence (BI) Center. Together, these teams are responsible for structuring, standardizing, developing, and advancing the use of technologies, digital methodologies, and decision-support tools.

The *CET* was established based on a Structuring Plan, which defines the initiative's strategic objectives as well as the roles and responsibilities of each area.

Within the BIM Center, the initiative is focused on embedding the BIM methodology as a core element of the Company's projects, enhancing technical quality, improving multidisciplinary coordination, and increasing execution predictability. Key benefits include improved project visualization, reduced rework, greater information reliability, enhanced interdisciplinary coordination, more accurate quantity takeoffs, and stronger integration with project planning.

BIM enables the integrated modeling of multiple engineering disciplines—including civil, mechanical, electrical, piping, and instrumentation—allowing design clashes to be identified during the early stages of a project. This contributes to reducing inconsistencies, improving engineering reliability, and minimizing field disruptions and rework.

The methodology also enables construction challenges to be anticipated during the planning phase through the simulation of clashes, access routes, construction sequencing, and installation constraints. When integrated with project scheduling (4D BIM), it also supports the evaluation of alternative execution scenarios and the identification of logistical bottlenecks.

This approach strengthens integration with methodologies such as Advanced Work Packaging (AWP) and Lean Construction, supporting the development of work packages based on the digital model.

Through the *CET*, we will standardize modeling practices, strengthen data governance, and promote integration with other digital environments, including Business Intelligence (BI). The BI Center is designed to ensure that digital models serve as a structured source of information for engineering, planning, procurement, and project execution. This approach will support decision-making, improve information traceability, and drive greater project efficiency.

COMPETITIVE ADVANTAGE

The *CET* plays a strategic role by standardizing practices, developing corporate guidelines, and supporting the adoption of these methodologies, ensuring that efficiency gains are consistently replicated across the Company. Over the coming years, the *CET* is expected to become a center of excellence in digital engineering and information management, strengthening the Company's competitiveness, increasing productivity, and fostering a culture driven by data, innovation, and continuous improvement.

This ongoing effort has been fundamental to advancing our innovation governance, driving greater efficiency, transparency, and quality in construction management and execution.

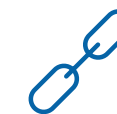


C2 HUB

On October 19, celebrated as Innovation Day, MILPLAN announced its partnership with C2 Hub. The partnership reinforces the Company's commitment to collaboration and the co-creation of solutions, aligning with the Hub's mission of connecting companies, industry leaders, and professionals who recognize collective intelligence as a driver of more innovative and integrated capital projects.

C2 Hub is a nonprofit association dedicated to advancing transformation, competitiveness, and sustainability in

Brazil's engineering, capital projects, and infrastructure sectors. It operates as a collaborative ecosystem that connects project owners with execution partners. The Hub promotes working groups, aligns industry best practices, and delivers training programs for member companies, fostering knowledge exchange, engagement, and workforce development across the sector.



This partnership will further strengthen MILPLAN's capacity to invest in innovation.

INNOVATION DRIVEN BY KNOWLEDGE

Aligned with its strategy of innovation and continuous development, MILPLAN participated in major technology, management, and industrial transformation events throughout 2025, strengthening its presence within knowledge networks and expanding its perspective on industry trends and emerging opportunities.



INBRASC CONNECT – BELO HORIZONTE (MG) EDITION

MILPLAN representatives attended the Inbrasc Connect – Belo Horizonte Edition, an event focused on the convergence of technology, innovation, and long-term strategic thinking. Through keynote presentations, panel discussions, and networking opportunities, the event brought together executives and industry experts to discuss organizational trends, helping strengthen the Company's culture of innovation and foster solutions aligned with the sector's future challenges.

BRAZIL LITHIUM & CRITICAL MINERALS SUMMIT 2025

MILPLAN also participated in the Brazil Lithium & Critical Minerals Summit 2025, held in Belo Horizonte, Minas Gerais. The event brought together industry leaders and professionals to discuss innovation, investment, and strategic partnerships across the lithium sector. During the summit, the Company showcased its expertise in strengthening the lithium value chain through comprehensive industrial assembly and maintenance solutions.



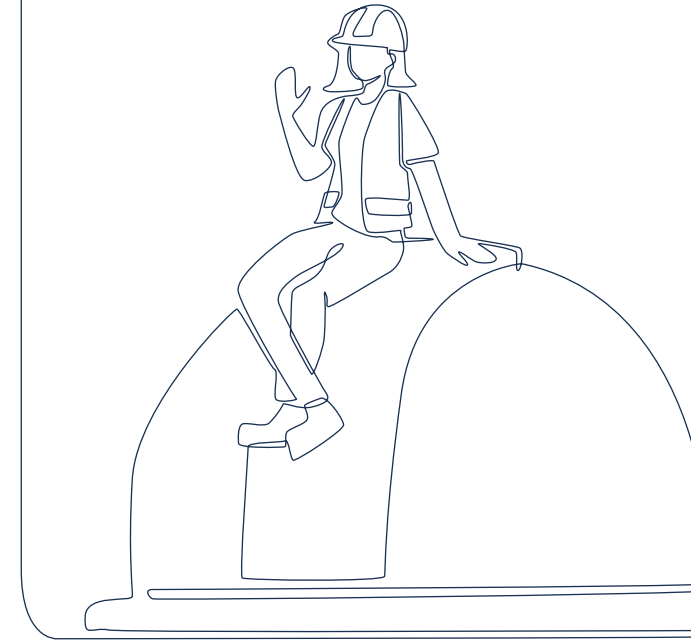


BRAZILIAN CONGRESS ON PROJECT MANAGEMENT AND LEADERSHIP (CBGPL)

MILPLAN's PMO team participated in the 20th Brazilian Congress on Project Management and Leadership (CBGPL), held in Fortaleza, Ceará. Organized through the collaboration of the Project Management Institute (PMI) chapters across Brazil, the congress is a leading forum for sharing emerging trends, best practices, and innovations in project management and leadership.

GULLCO EXPERIENCE TRAINING 2025

Held at the headquarters of Gullco International Ltd. in Ontario, Canada, the Gullco Experience Training 2025 brought together a dedicated team from MILPLAN for an immersive technical program focused on the latest advancements in mechanization and automation for industrial welding. These technologies play a key role in enhancing the quality and performance of the Company's operations. Participation in the program reinforces MILPLAN's commitment to continuous professional development, technical excellence, and the pursuit of innovative and sustainable solutions.



PROJECT HIGHLIGHTS

MODULARIZATION PROCESS

We further expanded the use of modularization at our project in Canaã dos Carajás, Para, reducing project timelines and increasing efficiency through an optimized assembly approach. By increasing the scope of module pre-assembly, we streamlined project execution and brought forward key milestones in the project schedule.

This approach not only reduced shutdown time but also delivered additional benefits during the assisted operation phase, enabling the plant to be commissioned ahead of schedule.

From a technological standpoint, the use of equipment such as self-propelled modular transporters (SPMTs) and hydraulic jacks for lifting heavy components played a key role in ensuring efficient module installation. In addition, the adoption of 4D visual planning and pre-assembly techniques enhanced project visualization, planning, and execution, improving efficiency across every stage of the construction process.





OFFSITE EXECUTION

At our projects in Tapira, Minas Gerais, and Ouro Preto, Minas Gerais, we expanded the use of offsite execution, shifting a significant portion of activities to controlled environments. This approach was designed to improve both productivity and quality. By performing work outside the construction site, we were able to operate in safer, more controlled conditions, optimize workforce utilization, improve operational efficiency, and minimize disruptions to project execution.

TECHNOLOGY USE

MILPLAN participated in the implementation of innovative technologies for a dry stacking solution, eliminating the need for tailings dams, as well as in the construction of the infrastructure for the tailings pipeline and slurry pipeline as part of the sustainable mining project in Miguel Burnier, a district of Ouro Preto, Minas Gerais.

Under the new system, production will be transported through a 13-kilometer slurry pipeline currently under construction, delivering significant operational and logistical benefits. One of the project's most important impacts will be the removal of approximately 400 trucks per day from BR-040, a highway that has experienced chronic traffic congestion for many years.

By reducing heavy truck traffic on the highway, the project will improve operational logistics and local infrastructure while easing congestion and benefiting the surrounding communities. Leveraging its expertise in delivering large-scale industrial projects, MILPLAN is helping drive this transformation, advancing sustainability and operational efficiency in the mining sector.

MANAGEMENT SAFETY WALKS

At the Ouro Preto, Minas Gerais, project, site management adopted an integrated safety approach centered on reinforcing the value of workplace safety. Project leaders maintained a daily presence at the construction site through management safety walks, reinforcing the importance of safe work practices and fostering a culture of care, awareness, and shared responsibility.

OUR PEOPLE

Employees	46
Occupational Health and Safety	59
Social Investment	66
Community Engagement	75
Human Rights	77

Sustainable Development Goals (SDGs):



EMPLOYEES



In 2025, MILPLAN received special recognition in the Engineering and Construction category of the Most Amazing Places to Work Award. This achievement reflects the strength of our organizational culture, which inspires pride, engagement, and a positive impact on society.

MILPLAN's 43-year history has been—and continues to be—shaped by the dedication and commitment of every employee. In 2025, we further embedded the Company's organizational culture through concrete initiatives focused on recognition, well-being, and development, reflected in day-to-day practices, at construction sites, and in our relationships with teams.

This commitment also received external recognition. MILPLAN was once again recognized in FIA's 2025 **Most Amazing Places to Work Award**, achieving an overall favorability score of 89.5%—4.8 percentage points

above the benchmark for the 150 highest-ranked companies and 1.6 percentage points higher than the previous year. We also remained among the **20 best large companies to work for** in Minas Gerais, according to GPTW 2025.

Throughout this chapter, we celebrate our employees as the true driving force behind our history, highlighting the practices that strengthen the integration of our culture into MILPLAN's operations. Over the course of the year, MILPLAN employed 8,436 people.



TOTAL EMPLOYEES

GRI 2-7, 405-1



8,436

Direct employees



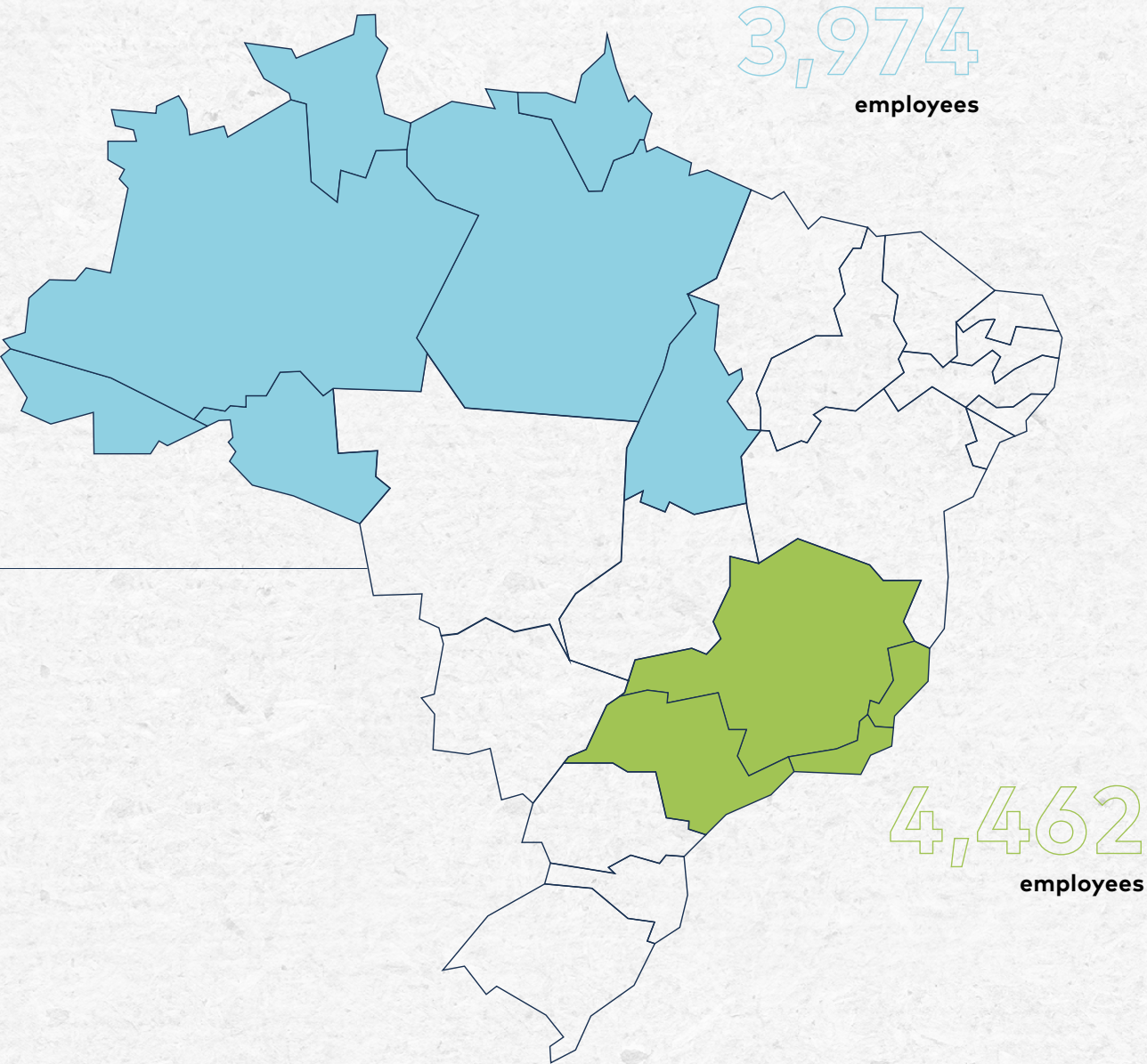
722

WOMEN



7,714

MEN

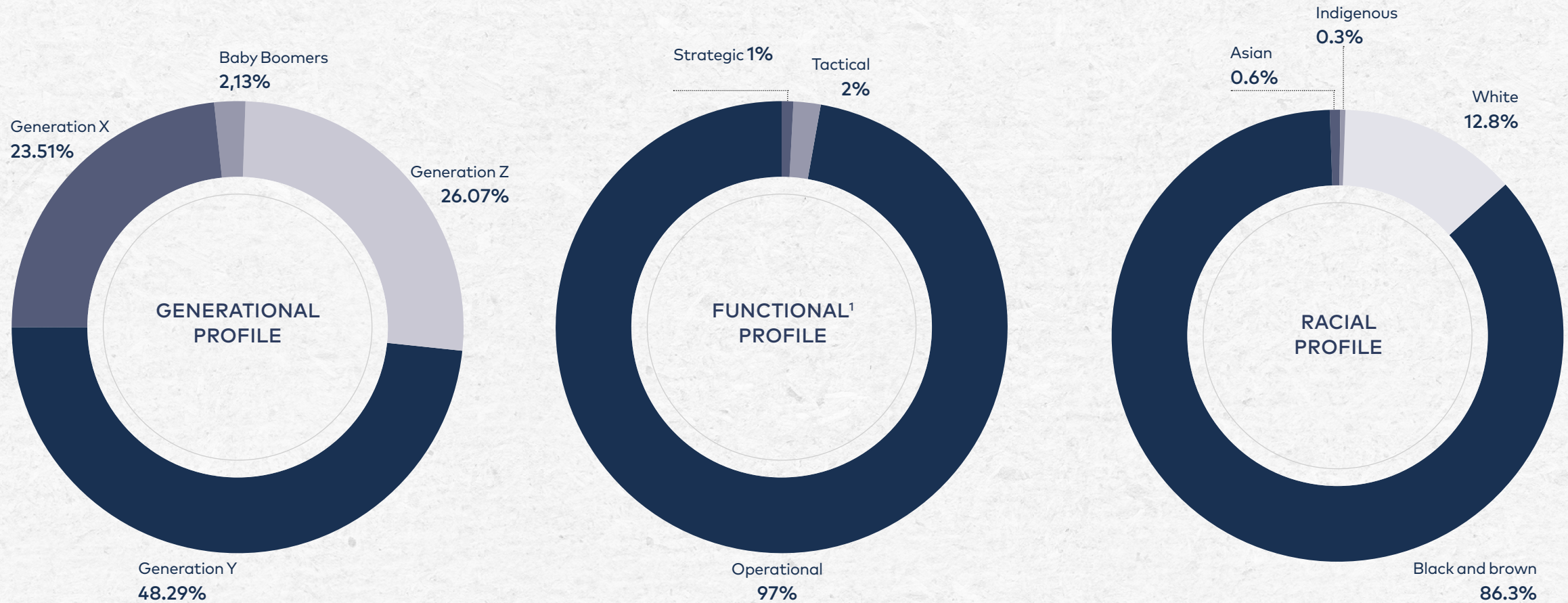


Notes:

- 1. Part-time employees include 10 interns and 39 apprentices.
- 2. Employee data were extracted from the ERP system's employee records report.

EMPLOYEE PROFILE

GRI 405-1



1- At MILPLAN, functional categories are organized into three levels: Strategic, which includes the CEO, Executive Board, managers, and coordinators; Tactical, consisting of supervisors; and Operational, which includes administrative staff, operational employees, and interns.

TALENT ATTRACTION AND RECRUITMENT

GRI 3-3, 401-2

In an industry challenged by intense competition and a shortage of qualified professionals—particularly for technical and operational roles—attracting, engaging, and retaining talent aligned with the Company's culture is essential to ensuring operational excellence, productivity, and stability across contracts.

To address this challenge, MILPLAN invests in structured initiatives that strengthen connections with its people, foster continuous development, and help create a workplace that promotes engagement and high performance.

MILPLAN BENEFITS



Medical and dental insurance



Life insurance



Private pension plan



Profit-sharing program



Meal and food allowances



Food basket



University partnerships



Gym membership program



Language school partnerships for corporate employees



Desenvolver platform, with online courses and trainings



Employee assistance program



Payroll-deductible loans



Pharmacy discount program



SESI Club membership



Utility bill discount program



Affinity (insurance)



Maternity kit



Home office



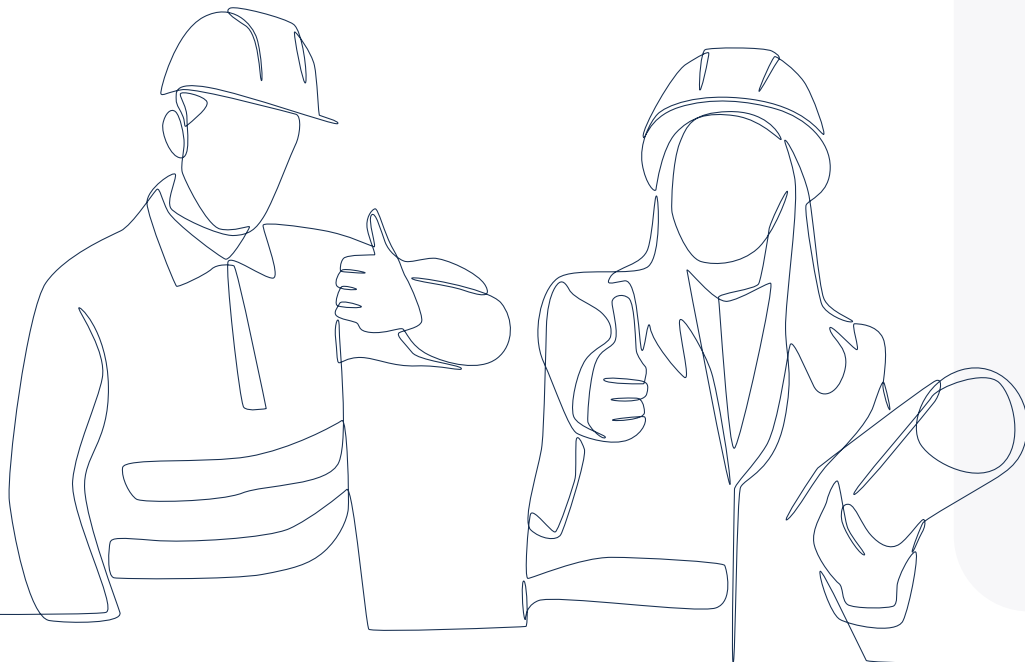
Transportation assistance



Psychological counseling benefit



Annual vaccination campaign



MILPLAN CULTURE WEEK 2025

In 2025, this commitment was further strengthened through MILPLAN Culture Week, a strategic initiative designed to turn the Company's values into everyday actions. More than communicating institutional principles, the initiative sought to create meaningful experiences that engaged employees, encouraged reflection, and inspired behaviors aligned with MILPLAN's culture across its operations.

The initiative also marked MILPLAN's 43rd anniversary, connecting the Company's history with its purpose of building responsibly, pursuing excellence, and remaining committed to its people.

"GENTE DE VALOR" EMPLOYEE RECOGNITION CAMPAIGN

Another highlight was the "*Gente de Valor*" employee recognition campaign, which celebrated employees who embody the Company's values through their everyday actions. The initiative recognized these behaviors while encouraging their adoption across teams, strengthening employees' sense of belonging and engagement. Recognized employees received a commemorative trophy representing the value they exemplified, an official certificate of recognition, and featured recognition across the Company's internal communication channels.

2025 TRAINEE PROGRAM

The 2025 Trainee Program serves as one of MILPLAN's primary entry points for emerging talent, targeting professionals eager to drive change and help build a more sustainable future. The program provides broad exposure to the Company's operations through assignments in different regions of Brazil, as well as direct interaction with mentors and multidisciplinary teams, offering practical, challenging learning experiences closely aligned with the Company's business needs.

Reflecting the program's success and maturity, all trainees who joined its inaugural 2023 class remain with the Company and now hold engineering positions.

TECHNICAL SITE VISIT

In 2025, MILPLAN welcomed Mechatronics Engineering and Electrical Engineering students from the Federal University of São João del-Rei for a technical site visit at the Miguel Burnier project in Ouro Preto, Minas Gerais. The visit provided students with firsthand exposure to construction site operations through knowledge sharing, presentations on industry best practices, and demonstrations of innovative solutions and mining technologies, including tailings filtration processes.



NEW HIRES AND EMPLOYEE TURNOVER IN 2025

GRI 401-1

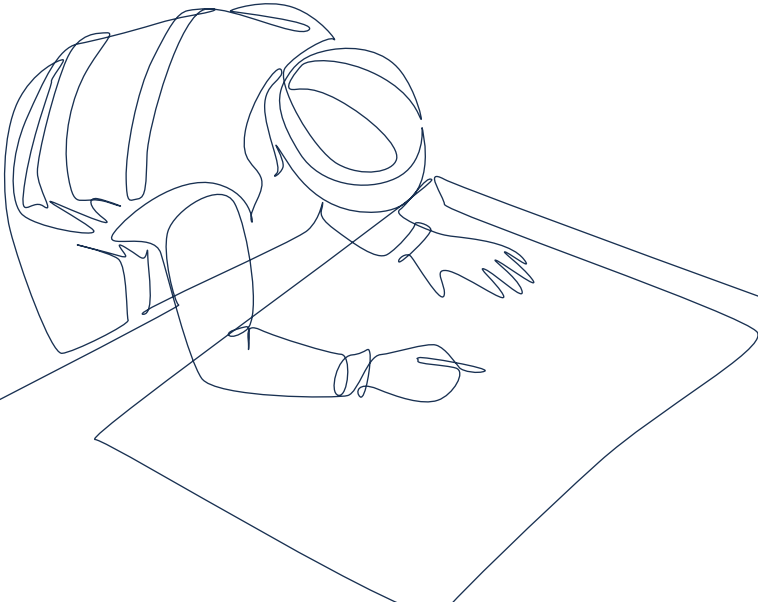
Attracting, developing, and retaining professionals whose skills and values align with MILPLAN's culture strengthens business performance, enhances client relationships, and empowers teams. It also helps mitigate risks associated with the loss of technical expertise, replacement costs, and impacts on team efficiency.

The indicators alongside reflect the operational dynamics of MILPLAN's business, where the completion and launch of projects—and their different phases—influence team structures and the number of professionals mobilized throughout the year.

New Hires and Employee Turnover in 2025

	New hires	Terminations	Hiring rate	Turnover rate
Gender				
Female	354	349	49%	48%
Male	4,757	4,590	62%	59%
Region				
North	2,331	2,474	59%	62%
Southeast	2,780	2,465	62%	55%
Age Group				
Under 30 yrs.	1,850	1,711	69%	63%
Between 30 and 50 yrs.	446	453	49%	49%
Over 50 yrs.	2,815	2,775	58%	57%
TOTAL	5,111	4,939	60%	58%

Note: Hiring and turnover rates are calculated as the ratio of the number of employees hired or separated (whether voluntarily or involuntarily) to the total number of employees within each respective category (gender, region, and age group).



LEARNING AND DEVELOPMENT

GRI 404-1, 404-2

In 2025, MILPLAN's Corporate Education function further strengthened its role as a strategic pillar for reinforcing the Company's culture, developing leaders, and enhancing the technical capabilities of teams across all projects and areas of operation. Beyond delivering training, the function served as a key link between strategy, people, and business performance.

Throughout the year, MILPLAN advanced the structuring of its learning processes, enhanced its development programs, and strengthened its learning governance, ensuring close alignment with the Company's 2025 Strategic Plan. All initiatives were designed to create value by providing consistent technical training, strengthening tactical and operational leadership, and developing critical competencies.

These initiatives were structured around the following strategic pillars:

- **Culture;**
- **Learning and Development;**
- **Development Programs;**
- **Performance Management;**
- **Organizational Climate.**



789,456

Training hours per year¹



8,436

Employees



93

Average training hours per employee

Training Hours by Functional Category and Gender in 2025² - GRI 404-1

Functional category ³	Female (hours)	Male (hours)	Average training hours per employee
Strategic	0	254	12
Tactical	445	1,524	12
Operational	408	1,603	0.24

¹ Total training hours include 785,223 hours of health and safety training delivered in 2025, in addition to 4,233 hours of training provided by the Human and Operational Development area.

² Includes only training delivered by the Human and Operational Development area. The table excludes Daily Safety Dialogues (DDS) and mandatory health and safety training.

³ At MILPLAN, functional categories are organized into three levels. The Strategic level includes the CEO, the Executive Board, and managers. The Tactical level comprises coordinators, specialists, and engineers, while the Operational level includes supervisors, administrative staff, operational employees, and interns.



In 2025, MILPLAN maintained a range of foundational initiatives designed to strengthen its learning strategy across the organization. The initiatives presented below expanded access to knowledge, fostered collaboration, promoted integration among teams, and supported employee development across different operational contexts.

DESENVOLVER PLATFORM

The *Desenvolver* Platform further strengthened its role as a strategic learning and development channel by offering content aligned with business priorities and integrated with the Company's development programs. Growth in platform usage was driven by the addition of Standard Operating Procedures (SOPs), Work Instructions (WIs), and the mandatory course "Digital Security Culture: Protecting Data and Information." The platform also achieved an NPS of 87, reaching an excellent satisfaction level.



ARTICULADORES DO SABER PROGRAM

Since its launch, the program has promoted knowledge sharing through employees from different areas of the Company, reinforcing learning as a continuous process embedded in day-to-day work. In 2025, the *Articuladores do Saber* assumed a more strategic role by developing learning content, supporting corporate programs, and creating technical learning pathways aligned with operational needs. Today, they serve as knowledge multipliers, structured content developers, and key connectors between business areas and the Company's learning ecosystem, contributing across all learning and development programs at MILPLAN.

TEAM BUILDING

Em In 2025, the Team Building initiative was expanded and further established as a strategic tool for team integration and development. Reintroduced at the Conceição do Mato Dentro (MG) project, the initiative incorporated a behavioral assessment methodology to strengthen self-awareness, collaboration, and key competencies such as communication, decision-making, and conflict management. The program achieved an 85.7% participation rate and an NPS of 100, with plans to expand to additional projects.

MILPLAN also encouraged employees to participate in strategic industry events. Throughout the year, five events were held, involving seven participants from the Engineering, Logistics, and People and Management areas, totaling 146 hours of professional development.

Within the Culture pillar, 2025 was marked by the redesign of the Company's onboarding process. The introductory training program was updated, and its content migrated to the *Desenvolver* Platform, centralizing learning materials in a single environment while ensuring standardized, continuous access. As part of this evolution, onboarding now includes the "Business Module," which familiarizes employees with how MILPLAN operates, creates value, and manages its contracts. This pillar was further reinforced by complementary initiatives, including MILPLAN Culture Week (see [page 50](#)) and the *Segurança de Valor* program, presented on [page 63](#).

CORPORATE ACADEMIES

The Learning and Development pillar was marked by the development and consolidation of MILPLAN's Corporate Academies. The Company's Leadership Development Pathway was restructured into dedicated academies—including the Leadership Academy, Engineering Academy, Safety Academy, and Innovation Academy—designed for engineers, managers, coordinators, and specialists, achieving an average participation rate of 70% in 2025. The learning architecture was designed to be integrated and flexible, combining core and role-specific modules aligned with the challenges and responsibilities of each audience.

Within the Development Programs pillar, MILPLAN continued to strengthen initiatives focused on developing operational leaders, preparing future talent, and enhancing workforce qualifications, with emphasis on the following programs:

Linha de frente program

The program remained focused on developing leaders working directly in operations. Structured as a three-stage learning journey that combines theory and practice, the program provides an integrated learning experience that enables participants to immediately apply new knowledge in their day-to-day work.

In 2025, the program evolved with a stronger emphasis on behavioral competencies and digital leadership. It achieved an average participation rate of 72% and an NPS of 92, demonstrating high levels of participant satisfaction and program relevance.

Trainee Development Pathway

The Trainee Development Pathway has become a strategic pipeline for developing engineering talent. In 2025, the program reached two important milestones: the completion of the 2023 Trainee Program, with six trainees advancing to engineering positions, and the launch of a new trainee class. The pathway combines hands-on experience at construction sites, mentoring, and classroom learning, providing a well-rounded development experience. In 2025, participants completed 64 hours of internal training across the Technical and Behavioral Development tracks. The pathway will be further strengthened through continuing education, with trainees who transition into engineering positions in 2026 enrolling in a postgraduate program in Project Management.

Capacitar program

The *Capacitar* Program was designed to develop fundamental skills and core competencies for entry-level operational employees. The program combines technical training, delivered in partnership with SENAI Ouro Branco (Minas Gerais), with behavioral development led by the *Articuladores do Saber* (Knowledge Ambassadors).

In 2025, the program set out to deliver six training groups across different construction sites. At the Ouro Preto (Minas Gerais) construction site, 18 employees completed the Industrial Electrical Systems – Power and Control course. At the Conceição do Mato Dentro (Minas Gerais) construction site, 33 employees graduated from two Industrial Mechanics training groups. In Tapira (Minas Gerais), the Company launched two training groups in Boilermaking Fundamentals and one in Construction Fundamentals and Technologies, with 32 participants currently enrolled. These training groups are still underway.

The Performance Management pillar, including its guidelines, practices, and results, is presented in the following section. The Organizational Climate pillar, which covers the employee engagement surveys conducted during the year, is presented on **page 46**.

PERFORMANCE MANAGEMENT

GRI 404-3

In 2025, MILPLAN further advanced the maturity of its performance management processes. The annual evaluation cycle was expanded to include a broader group of employees and the introduction of peer assessments. Eligible employees¹ at the executive, manager, coordinator, specialist, engineer, supervisor, analyst, and staff levels participated in the process and were evaluated on both technical and behavioral competencies. The behavioral assessment was based on MILPLAN's core values: safety, ethics, simplicity, collaboration, customer focus, and results orientation.

Throughout the year, 99%² of eligible employees participated in the performance evaluation process.

Another important milestone was the introduction of the Merit Cycle, an initiative that strengthens governance and enhances performance management through the implementation of Individual Development Plans (IDPs).

¹ Interns, operational employees, and employees with fewer than three months of service are not eligible to participate in the performance evaluation process.

² Two employees did not participate because they were on leave.

The Merit Cycle marked a significant step toward strengthening transparency, fairness, and governance in employee recognition processes. The initiative was designed in response to key findings from previous employee engagement surveys and was incorporated into the Company's performance management framework. Its purpose is to recognize and reward, in a structured manner, employees who consistently deliver strong results, demonstrate behaviors aligned with the Company's values, and make meaningful contributions to achieving strategic objectives.

The process was conducted under clear rules, objective criteria, and a defined, monitored budget, taking into account both employee performance and current compensation positioning. It was also supported by digital tools and Artificial Intelligence (AI), which provided recommendations based on predefined criteria, helping increase consistency in evaluations and support more equitable decision-making.

Among the program's key strengths were its alignment with the performance management process, reinforcement of a continuous feedback culture, connection to the Company's values, greater empowerment of tactical leadership, and a more agile decision-making process.

From a cultural perspective, the Merit Cycle has strengthened employees' perception of fairness and merit-based

recognition while fostering greater leadership accountability. Operationally, it has reinforced retention efforts and established a clearer link between performance, recognition, and career progression.

As a result of the 2025 Merit Cycle, 259 male employees were eligible, of whom 106 were recognized (41%). Among female employees, 45 were eligible and 22 were recognized (49%). The cycle also included employees with disabilities (PwDs): 36 were eligible, and 11 were recognized, representing 30%.

The post-cycle satisfaction survey recorded a favorability rating of 81%, confirming positive acceptance of the model and its potential to further strengthen MILPLAN's culture of recognition. The first Merit Cycle represented a significant milestone in the governance of the Company's internal career advancement processes.



DIVERSITY AND INCLUSION

GRI 405-1

Our commitment to diversity and inclusion goes beyond ensuring equal opportunities. We strive to create an environment where everyone can reach their full potential with dignity, respect, and recognition. Ableism remains a challenge in society, and overcoming it requires breaking down stereotypes and recognizing each individual's potential. At MILPLAN, we are committed to seeing people with disabilities not through the lens of their limitations, but as individuals with rights, talents, and unique experiences that enrich our workplace and strengthen our organization.

In 2025, we strengthened our diversity and inclusion strategy, with a particular focus on increasing the representation of people with disabilities (PwDs). The number of employees with disabilities increased from 185 in 2024 to 196 in 2025, representing a 6% increase.

To support this effort, we enhanced our recruitment and hiring processes, established policies and action plans, and implemented workplace accommodations, support measures, and accessibility initiatives to promote the full inclusion of employees with disabilities.

As part of our inclusion efforts, we conducted a satisfaction survey exclusively for employees with disabilities to assess their perceptions of workplace accessibility, the suitability of equipment, and their overall work experience. The survey achieved a satisfaction rate of more than 85%, demonstrating our continued progress toward creating a more inclusive and accessible workplace for everyone.

We remain committed to advancing this agenda through everyday actions and initiatives that reinforce the importance of diversity and inclusion as part of our organizational culture.

These efforts resulted in the hiring of 18 employees with disabilities during the year. Several of these hires came through employee referrals, helping expand our reach and attractiveness among the PwD community.



TRAINING AND PRODUCTIVE INCLUSION

MULHERES MIL

The *Mulheres Mil* Program is one of MILPLAN's initiatives aimed at promoting productive inclusion and increasing women's participation in the industrial sector. In December 2025, we launched another program class in Conceição do Mato Dentro (Minas Gerais), with 40 participants enrolled: 20 in the Industrial Machinery Maintenance Mechanic vocational training program and 20 in the Industrial Electrician vocational training program. Each program comprised 200 hours of instruction and concluded in February 2026. The initiative generated a social return on investment (SROI) of BRL 5.89 for every BRL 1.00 invested.

The *Mulheres Mil* Program received second place in the ESG category of the ABRH-MG Prêmio Ser Humano, which recognizes initiatives that deliver meaningful sustainability impacts.



40
Participants



3%
PwD participants



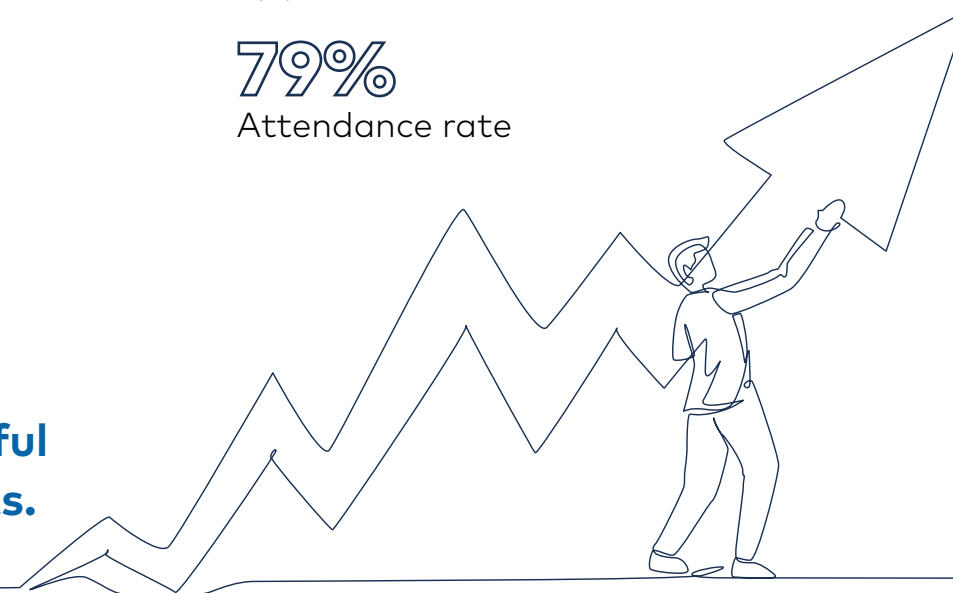
82%
Performance score



92%
Black and brown participants



79%
Attendance rate



STRATEGIC PARTNERSHIP

We continued our partnership with a consultancy specializing in disability inclusion, which remains instrumental in advancing MILPLAN's diversity and inclusion agenda.

The consultancy supports the identification, assessment, and certification of employees with disabilities, helping ensure a more structured, effective approach aligned with MILPLAN's needs.

WOMEN IN LEADERSHIP

Increasing the representation of women at MILPLAN also remained a priority, particularly in leadership roles. In 2025, women held 3.42% of leadership positions across the company, representing 29 professionals, including 27 coordinators and two managers.

RACIAL DIVERSITY

Racial diversity is another key pillar of MILPLAN's strategy. The company continues to work toward ensuring that its workforce reflects Brazil's diversity, with more than 86% of employees identifying as Black or Brown.

STRATEGIC DIVERSITY INITIATIVES

As part of its diversity strategy, MILPLAN continued to promote awareness and training initiatives on diversity across the organization. The company also invested in improvements to its facilities and equipment, including accessible restrooms and transportation adaptations, to enhance mobility, accessibility, and comfort for employees with disabilities.



PURPLE AUGUST: RAISING AWARENESS OF VIOLENCE AGAINST WOMEN

In August, the month dedicated to raising awareness of violence against women, we reinforced our commitment to fostering safer and more welcoming environments.

At our Conceição do Mato Dentro (Minas Gerais) construction site, in partnership with ASCOVILA, we hosted a community discussion on gender-based violence, open to both employees and local residents, followed by self-defense classes for women in the region. These initiatives reflect our commitment to helping build a more just, inclusive, and safer society for all women.

OCCUPATIONAL HEALTH AND SAFETY

GRI 3-3, 2-24, 403-1, 403-2, 403-8

Our commitment to health and safety is supported by an Integrated Management System (IMS), audited and certified in accordance with ISO 45001:2018, ISO 9001:2015, and ISO 14001:2015, and formalized through our Integrated Management Policy, which brings together quality, environmental management, and occupational health and safety under a unified approach focused on prevention, control, and continuous improvement.

Our Occupational Health and Safety (OHS) guidelines apply to everyone working across our operations, including both direct employees and contractors. In addition to complying with Brazilian Regulatory Standards (NRs) and internal procedures, we continuously strengthen a culture in which prevention is embedded at every stage—from activity planning through on-site execution. Although some frequency and severity indicators increased during the reporting period, we remained firmly committed to our goal of **zero fatalities**.

ACCIDENT AND INCIDENT MANAGEMENT

We maintain structured processes for hazard identification and management, including mandatory training, internal audits, management of change, and performance monitoring through safety indicators. We also conduct periodic technical assessments at construction sites and our corporate headquarters, including

the identification of physical, chemical, and biological hazards; updates to the Technical Reports on Hazardous and Dangerous Working Conditions (*LTIP*) and the Technical Report on Environmental Working Conditions (*LTCAT*); reviews of risk assessments by role and department; and the issuance of the corresponding Technical Responsibility Records (*ARTs*).

Based on this ongoing assessment process, occupational risks are managed in accordance with the hierarchy of controls, including reviewing work methods and processes, substituting hazardous materials or activities, implementing engineering controls, adopting collective and personal protective measures, and applying admin-

istrative controls. These actions feed into the continuous improvement (*PDCA*) cycle, ensuring that lessons learned are incorporated into our processes and contribute to the ongoing advancement of our OHS management system.

Worker participation is a fundamental element of this approach. Tools such as Preliminary Risk Analysis (PRA), Work Permits (WPs), and the Right to Refuse Unsafe Work support the early identification of hazards and reinforce employees' active role in accident prevention. We adopt a preventive, non-punitive approach, ensuring that employees can report hazards or exercise their rights without fear of retaliation.

Safety is more than a priority at MILPLAN—it is a core value and a prerequisite for everything we do, because it is the foundation of our commitment to protecting what matters most:

LIFE.





GRI 403-4, 403-7

When accidents or incidents occur, every event is formally reported and investigated by multidisciplinary teams through root cause analysis, followed by the implementation of corrective actions. These actions are documented in Accident Investigation Reports and consolidated into monthly statistical reports and safety dashboards, enabling the identification of recurring patterns, the assessment of the effectiveness of implemented measures, and the sharing of lessons learned through internal meetings and forums.

Our OHS governance framework also includes dedicated mechanisms for managing critical events. High-potential incidents are reviewed by the Safety Committee, established in 2026, while, in the event of a fatality, the Crisis Committee is immediately activated to assess the incident, define emergency response measures, communicate with stakeholders, oversee the investigation, and monitor corrective and preventive actions. During the reporting period, the Crisis Committee was not activated, as no fatal accidents occurred.

This same prevention and control approach extends throughout our business relationships. At MILPLAN, we recognize that occupational risks may also arise in outsourced activities, shared work fronts, subcontracted operations, and throughout the supply of materials and equipment.

The management of these risks begins during the supplier qualification and approval process, which includes the assessment of legal, labor, and occupational health and safety requirements, mandatory documentation, tax and social security compliance, and evidence of required training. Once engaged, contractors and service providers participate in mandatory safety induction covering internal procedures, risk assessment, the use of personal protective equipment (PPE), the Emergency Response Plan (ERP), the Right to Refuse Unsafe Work, and incident reporting procedures.

Contracts also include specific clauses requiring compliance with the company's Health, Safety, and Environment (HSE) standards, with provisions for sanctions, work stoppages, or contract termination in cases of non-compliance. Incidents involving contractors are continuously monitored and analyzed by MILPLAN to identify systemic causes, strengthen controls, and continuously improve supplier qualification and management criteria.

EMPLOYEE ENGAGEMENT AND COMMUNICATION

We continuously promote communication, awareness, and shared responsibility for risk prevention. One of our primary employee engagement tools is the **Health Census** survey, conducted annually across all operating units to assess employees' perceptions of health and safety, identify opportunities for improvement, and evaluate the effectiveness of implemented initiatives.

We also maintain an active Internal **Commission for Accident Prevention (CIPA)**, which serves as the formal employee representative body for discussing workplace hazards, unsafe conditions, and improvement opportunities. The committee meets monthly and includes employee-elected members, company-appointed representatives, and invited contractor representatives. Throughout 2025, CIPA continued its regular activities, including workplace inspections, operational condition assessments, and discussions of new preventive initiatives.

Employee participation is encouraged from their first day on site. All employees complete mandatory safety induction programs provided by both

MILPLAN and its clients, including Daily Safety Talks (*DDS*), which reinforce preventive communication. Conducted before the start of each workday, these talks cover task-specific hazards, preventive measures, lessons learned, and individual and collective responsibilities. Complementing these activities, MILPLAN also holds Coffee with Leadership sessions, which provide an open forum for dialogue between leaders and operational teams, encouraging transparent communication, active listening, and greater employee ownership in building safer workplaces.

We also conduct awareness campaigns on critical safety topics, including hand protection, working at heights, and safe driving, in addition to *SIPAT* 2025 (Internal Week for Accident Prevention), whose theme was "Knowing How to Live Well." Topics addressed included psychological safety, burnout, healthy aging, fall prevention, climate change, audit preparedness, and healthy sleep habits.

We maintain permanent internal communication channels that enable the immediate reporting of unsafe conditions and provide direct access to leaders and Health, Safety, and Environment (HSE) teams.



GRI 403-5

TRAINING AND DEVELOPMENT

Strengthening MILPLAN's safety culture begins with the continuous development of its people. In 2025, the Company recorded 785,223 hours of occupational health and safety (OHS) training, compared with 284,121 hours in 2024, driven by the expansion of training initiatives throughout the year. Training covered both general and role-specific topics, taking into account operational risks, legal requirements, contractual obligations, internal procedures, and the ongoing reinforcement of a proactive safety culture.

A key initiative is the **Decatlon Program**, which promotes a proactive approach to accident prevention,

the protection of employees' physical well-being, and environmental sustainability, reinforcing both individual and collective responsibility for safety.

This approach is further supported by the **Bussola Program**, (Mentor and Mentee), which provides a structured onboarding process for new employees during their first 90 days, combining continuous guidance, knowledge transfer, and reinforcement of safe work behaviors.

In addition, the **Proteção das Mãos & Dedos Program** helps prevent upper-limb injuries through awareness initiatives and by promoting practices such as "*Mãos Livres*" and "*Mão Amiga*".



GRI 403-9, SASB IF-EN-320a.1

Work-related Injuries			
	2023	2024	2025
TOTAL HOURS WORKED	12,269,719	12,774,007	10,229,190
Number of work-related severe injuries (excluding fatalities)	-	3	0
Severe injury rate	-	0.23	0
Number of recordable work-related injuries (including fatalities)	28	-	25
Recordable injury rate	2.28	-	2.44

- Notes:**
- 1 Rates were calculated using a factor of 1 million hours worked.
 - 2 Among direct employees, the most common work-related injuries in 2025 involved hand injuries, including cuts and crush injuries sustained while handling materials or tools. No fatalities resulting from work-related injuries were recorded.
 - 3 Work-related injury data cover MILPLAN Engenharia's operations and its consortia.
 - 4 Data on work-related injuries involving contractors are not available, as each contractor is responsible for managing and formally reporting its own occupational health and safety (OHS) indicators in accordance with its legal and contractual obligations. Nevertheless, MILPLAN monitors compliance with the applicable legal and contractual OHS requirements for contractor companies.

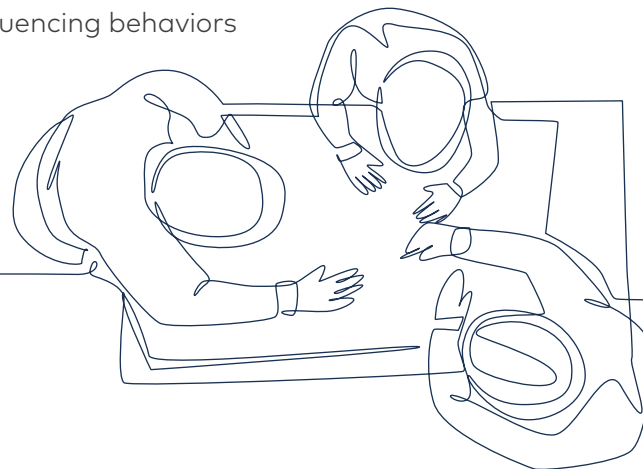
The following are the key initiatives undertaken throughout the year that reinforce our commitment:

"SEGURANÇA COMO VALOR" PROGRAM

As the Company's flagship initiative in 2025, *Segurança como Valor* Program served as the foundation for many of MILPLAN's strategic actions, reinforcing safety as both a cultural principle and a non-negotiable value. The program encourages reflection, knowledge sharing, and a stronger commitment to preserving life, while supporting safety initiatives across the organization.

Structured around quarterly meetings with leadership, the program reinforces leaders' role as the primary champions of MILPLAN's safety culture, expanding their responsibility for promoting safe attitudes and behaviors at every level of the organization.

The initiative further strengthens the collective development of the Company's safety culture, demonstrating that organizational transformation is most effective when leaders take an active role in influencing behaviors and fostering trust.



DAILY SAFETY TALKS (DDS)

DDS are an essential part of activities at our construction sites, helping reinforce risk awareness, facilitate the exchange of critical information, and strengthen our commitment to protecting everyone on site. One of these sessions was conducted in partnership with the Military Police of Minas Gerais at our Ouro Branco (MG) project, addressing important issues that affect employees both in and outside the workplace, including:

- Drug trafficking: prevention and enforcement;
- Alcohol use: impacts and awareness;
- Child exploitation: identifying and preventing abuse;
- Maria da Penha¹ Law: promoting respect and protection.

¹ The Maria da Penha Law is Brazil's primary legislation to prevent, address, and punish domestic and family violence against women, while also establishing protective measures for victims.

2 MILLION WORKING HOURS WITHOUT A LOST-TIME INJURY (LTI)

In 2025, we reached a major milestone at our Ouro Branco (MG) and Miguel Burnier (MG) projects: 2 million working hours worked without a lost-time injury (LTI). This achievement reflects MILPLAN's operational maturity and the strength of its safety culture, built collectively across the organization. It also demonstrates the commitment of our employees, the ongoing dedication of our teams, and the strong partnerships we maintain with our clients.





8TH NATIONAL HEALTH AND SAFETY CONGRESS

MILPLAN participated in the 8th National Health and Safety Congress, Brazil's largest multidisciplinary event dedicated to occupational health and safety. The conference addressed emerging OHS challenges, psychosocial risks in the workplace, best practices recognized by the 2025 *Proteção Brasil* Award, and the role of technology and innovation in occupational health and safety.

1ST HEALTH AND SAFETY WORKSHOP – ANCHIETA (ES)

At the Anchieta (ES) project, focused on the reactivation of pelletizing plants, MILPLAN held its 1st Health and Safety Workshop, bringing together 130 company leaders. The event provided an opportunity to share experiences, lessons learned, and best practices that reinforce the Company's commitment to protecting lives, safeguarding employee well-being, and achieving operational excellence.

2025 HSE WORKSHOP

Throughout the year, MILPLAN held the 2025 HSE Workshop, bringing together leaders and safety focal points to review the year's results and define priorities for the year ahead. Topics discussed included:

- Legal aspects related to Health, Safety, and Environment (HSE);
- Occupational health as a driver of productivity;
- Environmental legal requirements;
- The importance of leadership in strengthening the safety culture.

ZERO ACCIDENTS CULTURE

At the Ouro Branco (MG) electromechanical assembly and rail terminal project, MILPLAN held an event focused on its Zero Accidents culture, creating an opportunity for collaboration and engagement among employees and managers. The event emphasized care, prevention, and employee well-being, fostering a work environment built on safety, trust, and mutual respect.

WORKSHOP QHSE - CANAÃ DOS CARAJÁS (PA)

MILPLAN brought together its QHSE team from Brazil's Northern Region for an immersive workshop dedicated to safety processes in large-scale industrial assembly projects. The event reinforced safety as one of the Company's non-negotiable values and promoted a culture of commitment, accountability, and mutual care.



OCCUPATIONAL HEALTH

GRI 403-3, 403-6

MILPLAN maintains a structured approach to managing indicators, programs, and services focused on monitoring employee health, identifying occupational risks at an early stage, and promoting overall well-being.

One of the Company's primary mechanisms is the monitoring of occupational medical examinations, including pre-employment, periodic, return-to-work, and exit medical examinations. This process helps assess employees' health conditions, identify potential work-related health issues, and evaluate the effectiveness of preventive measures.

Management of leave through Brazil's National Social Security Institute (*INSS*) is also part of this process, enabling the Company to monitor the causes of employee absences and support initiatives aimed at reducing their operational and financial impacts. By the end of 2025, 159 employees were on *INSS* leave. In addition, absenteeism indicators help analyze attendance patterns, identify trends, and support initiatives related to working conditions and occupational health.

In 2025, MILPLAN continued conducting its Health Census, designed to better understand employees' physical and mental health profiles, identify risk factors, and develop initiatives that promote well-being and help prevent illness. The initiative achieved an 85% participation rate, exceeding the Company's target of 70%.

The census findings also supported the development of new ergonomics initiatives, including the preparation of an Ergonomics Handbook on manual material handling, providing guidance on posture, recommended weight limits, load handling, and the prevention of musculoskeletal disorders. In addition, a Work Instruction was developed to monitor employees with hypertension and diabetes, along with the implementation of Ergonomics Committees at construction sites and administrative offices. These initiatives will be rolled out beginning in 2026.

MILPLAN also promotes additional health initiatives, including its **Annual Influenza Vaccination Campaign**, carried out across all construction sites and administrative units. In 2025, the campaign achieved an 81.61% participation rate, with 2,174 direct employees and 128 contractor employees vaccinated, in addition to the donation of 324 vaccine doses to the local municipality.

Another highlight is the **Laços de Vida Program**, conducted in partnership with Exclusive Seguros, which supported 27 expectant mothers throughout the year, including employees and the spouses of employees based at the Company's headquarters, providing assistance from pregnancy through the postpartum period. Of these, 21 received a baby care kit, while six remained enrolled in the program at year-end. Also in partnership with Exclusive Seguros, MILPLAN operates the **Linha de Cuidados Program**, which supports employees with chronic health con-

ditions through monthly follow-up by the nursing team. The program provides health guidance and assistance in accessing services within the health insurance provider's accredited network.

Throughout the year, the Company also promoted a variety of health awareness campaigns addressing physical and mental health, disease prevention, and early diagnosis. Topics included White January, Safe Carnival: Alcohol and Other Drug Abuse Prevention, Yellow May, Winter Health Awareness, Yellow September, Pink October, Blue November, and Red December.

MILPLAN also maintains its Hearing Conservation Program (HCP) and Respiratory Protection Program (RPP) throughout the year. These programs are implemented at all locations where employees are exposed to noise or airborne dust. Activities include periodic medical examinations, training on the proper use, storage, cleaning, and maintenance of personal protective equipment (PPE), as well as preventive guidance on occupational hazards.

The confidentiality of employees' health information is treated as a priority. Access to medical records is restricted to each unit's healthcare team, in compliance with Brazil's General Data Protection Law (*LGPD*), while all other health data are accessible exclusively to the healthcare team at the Company's headquarters.

SOCIAL INVESTMENT

GRI 203-1, 203-2, 413-1

MILPLAN's Social Responsibility Policy allocates a portion of the Company's results to social initiatives in the communities where it operates, with the goal of creating lasting positive impacts and strengthening relationships with local communities.

MILPLAN's Social Responsibility Plan is built on cross-sector partnerships involving clients, public agencies, community leaders, and Civil Society Organizations (CSOs), including associations and non-governmental organizations (NGOs). These partnerships help identify priority needs and support initiatives focused on capacity building, social inclusion, and development for those who need it most.

In 2025, MILPLAN continued strengthening its social development efforts by carrying out 53 social initiatives, funded through Company resources, tax incentive mechanisms, contractual commitments, and volunteer activities. Together, these initiatives directly benefited 17,610 people across several regions of Brazil.

During the year, the Company invested BRL 4.8 million in social, cultural, and educational initiatives and donated more than 2.16 metric tons of food and hygiene products. These efforts involved 47 partner organizations and were carried out in every location where MILPLAN operates.

The following are the Company's principal social initiatives carried out in 2025.

2025 HIGHLIGHTS



BRL 4,785,021.00

Invested in Social Responsibility, including tax incentive projects.



52% increase in social investment compared to the previous year



53

Social initiatives, Campaigns, and Projects carried out



17,610

People directly benefited

MILPLAN SOCIAL PROJECT PORTFOLIO



MILPLAN completed another class of the *Impacto MIL* Program, an initiative designed to strengthen the third sector. The program trained 10 Civil Society Organizations (CSOs) in organizational management, fundraising, and project development, fostering sustainable development in the communities where the Company operates. With the participation of 17 representatives and 20 training sessions, the program delivered 80 hours of instruction, promoting the exchange of best practices and collaboration among participating CSOs.

Testimonials:

"The program was incredibly enriching. I learned so much and feel motivated to pursue new fundraising opportunities. I leave with more knowledge and enthusiasm." –E.P., from Recanto Feliz.

"The training exceeded my expectations. The content was comprehensive and will be extremely valuable as our association moves forward." –S. A., from Pequenos do Amor.

"I would like to thank everyone for this opportunity and everything I learned. This training was outstanding and has been essential to our organization's growth." –T.T., from Jardim Liberdade

83%

of participants rated the training content as **excellent** and **17%** rated it as **great**.

100%

of participants stated that the training content **made a significant contribution** to their organization's work.

94%

of participants awarded the program a perfect score of 10 out of 10 and said they would **RECOMMEND IT** to a colleague.





ACOLHER PROJECT

Through *Acolher* project, MILPLAN supports Recanto Feliz, a long-term care facility for older adults located in the Betania neighborhood of Belo Horizonte (MG). In partnership with CDM Projetos Sociais, the initiative promotes well-being, dignity, and opportunities for the institution's residents through yoga and arts and crafts workshops. Special activities were also organized to celebrate commemorative dates, bringing joy and meaningful experiences to the 35 beneficiaries, including 20 permanent residents.

- 74 yoga and arts and crafts sessions, totaling 178 instructional hours;
- 9 commemorative events;
- 2 community outings;
- 20 hours of training through the *Impacto MIL* Program.

ASSOCIAÇÃO DE CAPOEIRA DANDARA BAMBULA

In partnership with Vale, MILPLAN supported the Associação de Pais e Amigos dos Excepcionais (APAE) unit in Canaã dos Carajás (PA) through an inclusion and development initiative benefiting 50 students. Conducted by the Associação de Capoeira Dandara Bambula, the program provides capoeira and music classes twice a week over a ten-month period, helping participants develop motor, cognitive, and social skills. At the conclusion of the project, musical instruments will be donated to APAE to ensure the continuity and expansion of the activities.

MANICURE TRAINING COURSE

In response to a community need, MILPLAN offered a professional manicure training course in partnership with the Associação Comunitária da Vila Feitosa e Região (ASCOMVIFER) in Canaã dos Carajás (PA). The 45-hour course was provided to 10 women with the goal of strengthening female entrepreneurship and supporting income generation.

TRANSFORMANDO VIDAS PROJECT

In 2025, MILPLAN began supporting *Transformando Vidas* project in Canaã dos Carajás (PA), an initiative that uses jiu-jitsu as a tool for social inclusion and values-based education for young people in the local community. In partnership with Vale, the Company funded the donation of 50 square meters of tatami mats, expanding the training area and providing better conditions for classes. Special kits containing backpacks and reusable water bottles were also distributed to the 45 participating students.

COMITÊ MINEIRO DE VOLUNTARIADO CORPORATIVO

MILPLAN is a Master Sponsor of the Comitê Mineiro de Voluntariado Corporativo. This partnership reinforces the Company's commitment to sustainability, ethics, and collaboration while encouraging stronger connections among companies, employees, and communities to promote social engagement and sustainable development.

MAIS JUDÔ PROJECT

The *Mais Judô* project continued to reinforce MILPLAN's commitment to education, sports, and social inclusion in Ouro Branco (MG). Since December 2024, the project has benefited more than 100 children and adolescents enrolled in the public school system by providing comprehensive support, educational activities, and events such as the 1st Internal Judo Festival, held in June. The event celebrated participants' achievements while encouraging continued progress in the months ahead.



MILPLAN GUARAPARI SENIOR VOLLEYBALL CUP

MILPLAN sponsored the 3rd MILPLAN Guarapari Senior Volleyball Cup, bringing together 300 athletes from cities across Espírito Santo and other Brazilian states. Designed for older adults between 45 and 68 years of age, the tournament promotes health, well-being, inclusion, and quality of life. The event also created opportunities for athletes and their families to connect, highlighting how sports can foster both healthy lifestyles and social integration.



CARDIO-ONCOLOGY SERVICE AT SÃO FRANCISCO HOSPITAL

In November 2025, MILPLAN participated in the inauguration of the Cardio-Oncology Service at Hospital São Francisco in Belo Horizonte (MG). The project was approved under the Belo Horizonte Municipal Fund for Older Adults and made possible through funding provided by MILPLAN.

The service delivers specialized care for cancer patients with cardiovascular conditions, helping reduce heart-related complications while supporting the continuity of cancer treatment. The initiative expands the hospital's capacity to provide care and reinforces its commitment to innovation, comprehensive patient care, and partnerships benefiting patients served by Brazil's Unified Health System (SUS).



For more information about the initiative: [CLICK HERE](#)



For more information about the initiative: [CLICK HERE](#)

HOUSING RENOVATION PROJECT

In 2025, MILPLAN launched a housing renovation project in the municipalities of Conselheiro Lafaiete, Ouro Branco, and Congonhas, improving living conditions for families experiencing social vulnerability.

A total of 17 homes were renovated, with improvements tailored to each household's most urgent needs. Priority was given to female heads of household, helping enhance safety, comfort, dignity, and quality of life for the families served.

CORPORATE VOLUNTEERING

Our corporate volunteering initiatives promote a culture of social engagement and generate positive impacts in the communities where we operate.

To support the development of the MILPLAN Volunteering Plan, we partnered with a specialized consulting firm that provided structured advisory services for the Corporate Volunteering Program. The work included an assessment of internal data, training and capacity-building activities, and online surveys conducted with employees.

The survey found that 67% of employees are interested in participating in volunteer activities, reflecting a workforce that is increasingly engaged and committed to collective well-being. Based on these findings, we expanded our volunteering initiatives throughout 2025.

The following are the main volunteering initiatives carried out during the year.

In 2025, we made significant progress with the launch of the MILPLAN Volunteering Plan, which encourages collaboration across different areas of the Company and reinforces our commitment to building a more equitable and sustainable future.





SUPERKIDS

To celebrate Children's Day, volunteers from *Mãos à Obra* Program organized a special event for more than 100 children supported by *Pequeninos do Amor*, an association located in the Olhos D'Água neighborhood of Belo Horizonte (MG). Children participated in recreational activities, including theater performances, painting, clay workshops, and other games designed to promote well-being and support their development.

HYGIENE ESSENTIALS DRIVE

MILPLAN organized a donation drive to collect essential hygiene items for long-term care facilities for older adults in Belo Horizonte (MG). A total of 1,397 items were collected and assembled into 150 hygiene kits containing soap, moisturizer, and face towels, which were donated to Lar dos Idosos São José and other institutions. The Company's volunteer team also delivered the donations and provided diapers to help support the well-being of the residents.

CHRISTMAS INITIATIVE – RECANTO FELIZ

MILPLAN volunteers dedicated their time to bringing care and companionship to Recanto Feliz, a long-term care facility for older women. With the participation of more than 45 volunteers, the initiative included the "Caring for Caregivers" workshop for the institution's staff, artistic performances, gift distribution for residents, and a special dinner. More than 40 people directly benefited from the initiative.

RED JUNE CAMPAIGN

In June, MILPLAN joined the Red June Campaign, a nationwide blood donation awareness initiative, by organizing a blood donation drive in Ouro Branco (MG) as part of its *Mãos à Obra* Program. The initiative encouraged employees to donate blood and contribute to the well-being of those in need while fostering solidarity and collective engagement.

CHRISTMAS INITIATIVE – TOY DONATION DRIVE

In 2025, MILPLAN organized a Christmas toy donation drive at its project sites in Ouro Branco and Miguel Burnier, a district of Ouro Preto (MG), with the goal of bringing joy to children in the communities where the Company operates. Employees were mobilized to collect toys, which were donated to local children. In partnership with Gerdau, the initiative exceeded its fundraising goal, collecting 215 toys.



TAX INCENTIVE PROJECTS



**BRL 2.7 M
invested**



**3 municipalities
benefited**



**Over 14 K
people
impacted**

Below are the projects supported by MILPLAN and the Company's social investments made through Brazil's tax incentive programs:

MAINTAINING THE ACTIVITIES OF ESPAÇO CULTURAL MANO DOWN

MILPLAN supported the Maintaining the Activities of Espaço Cultural Mano Down project, which aims to ensure the continuity of the cultural programming offered by the Instituto Mano Down. Implemented in Belo Horizonte (MG), the initiative provides 12 months of free courses and workshops in dance, singing, introductory instrumental music, capoeira, and theater for people with Down syndrome, intellectual disabilities, or living in situations of social vulnerability.

In 2025, MILPLAN invested BRL 640,000 through Brazil's Federal Culture Incentive Law (Rouanet Law), directly benefiting approximately 1,000 people of all ages. Throughout the year, participants showcase what they have learned through music, theater, and dance performances held at various venues, providing greater visibility and recognition for their talents.



**In recognition of its support,
MILPLAN received the
"Empresa Amiga" Seal in the
Outstanding category from the
Instituto Mano Down in 2025,
acknowledging the Company's
contribution to cultural
development and inclusion.**



MUSEU PARA A JUVENTUDE!

MILPLAN supported the *Museu para a Juventude!* project through CEDUC Virgílio Resi, a vocational education institution in Belo Horizonte (MG) with more than 20 years of experience preparing young people for the workforce. Through an investment of BRL 80,000 from the Fund for the Rights of Children and Adolescents (FIA), the initiative enabled visits to 18 museums, three audio-visual courses totaling 96 instructional hours, a 36-hour videocast production course that resulted in 18 videocasts, and a Digital Awareness Week. Overall, the project directly benefited 630 adolescents, promoting social inclusion and supporting their professional development.



KARATÊ E CIDADANIA PROJECT

Through Brazil's Federal Sports Incentive Law, MILPLAN invested approximately BRL 154,000 in the *Karatê e Cidadania* project in partnership with Samurai Zen.

The initiative uses karate as a tool for social inclusion and citizenship education for children and adolescents, fostering participants' physical, mental, and ethical development. Implemented in Parauapebas (PA), the project directly benefited 200 young athletes through educational activities and sports training.

DESPERTAR PROGRAM - 2ND EDITION

In support of Fundação Vicintin, MILPLAN invested BRL 80,000 in the *Despertar* Program– 2nd Edition through the Fund for the Rights of Children and Adolescents (*FIA*). The program aims to provide professional training opportunities for 48 adolescents and young adults from the public school system.

Participants received training in Programming and Robotics, Home Automation and IoT Systems, and Information Technology and Administrative Processes, equipping them with the skills needed to pursue careers in innovative, high-growth industries. The program supports participants' professional development while creating opportunities for social mobility and digital inclusion.

AMBIENTE CONFORTÁVEL: QUALIDADE DE VIDA PARA OS IDOSOS PROJECT

Through the Municipal Fund for Older Adults (*FMI*), MILPLAN invested BRL 160,000 in the *Ambiente Confortável: Qualidade de Vida para os Idosos* project, aimed at creating a safer, more comfortable, and more functional environment for residents of Lar Comunitário Frederico Ozanan in Ouro Branco (MG).

The investment funded renovations to the men's and women's wings, as well as the modernization of the institution's kitchen, improving facilities for the 29 older adults receiving care. The project directly enhanced the institution's infrastructure, providing residents with greater comfort, safety, and quality of life.



VIVENDO COM DIVERSIDADE PROJECT

In partnership with the Associação Mais Acessível, MILPLAN invested approximately BRL 167,000 in the *Vivendo com Diversidade* project through Brazil's Federal Sports Incentive Law.

The initiative promotes access to sports for people with disabilities in Belo Horizonte (MG). By encouraging participation in adaptive sports, the project helps reduce inactivity and social vulnerability while fostering the development of sport-specific skills. The initiative directly benefited 40 athletes, promoting inclusion, empowerment, and social transformation through sport.

COMMUNITY ENGAGEMENT

GRI 3-3, 203-1, 203-2, 413-2

MILPLAN recognizes that its operations generate both actual and potential impacts in the communities where it operates. For this reason, the Company manages its relationships with local communities in a structured, ethical, and transparent manner, guided by its ESG Policy, Social Responsibility Plan, and Integrated Management System (IMS).

Oversight of this topic is provided by the ESG Committee, which conducts monthly reviews of local conditions and reported issues, monitors the continuous improvement of initiatives, and ensures that social investments remain aligned with the actual needs of the communities. The Company also maintains open communication channels, including its **Ethics Channel**, to receive suggestions, concerns, and complaints from communities affected by its projects, incorporating this feedback into its social governance processes.

Among the principal impacts managed by the Company as a result of workforce mobilization are increased housing costs, pressure on local public services, potential

neighborhood conflicts related to noise, heavy vehicle traffic and dust, as well as the risk of economic dependence following the completion of major contracts. To mitigate these impacts, MILPLAN works in partnership with local governments, implements social campaigns, invests directly in community infrastructure, promotes professional training, strengthens Civil Society Organizations (CSOs), and supports regional economic development by prioritizing the hiring of local workers and suppliers.

The Company's social investment monitoring framework is based on strategic objectives, impact targets, and performance indicators established under its ESG Policy. Both quantitative and qualitative indicators are monitored, including the number of beneficiaries, participation rates, dropout rates, funds raised through tax incentive programs, and social return on investment.

In 2025, MILPLAN made significant investments in community infrastructure and public and social services, helping expand access to community spaces, education, care services, and digital inclusion.

COMMUNITY CENTER

MILPLAN renovated the headquarters of the Associação de Moradores da Comunidade Guanabara in Anchieta (ES), which had been out of use due to a lack of maintenance. The renovation included upgrades to the electrical system, repainting of the building and perimeter wall, repairs to metal fencing, the construction of a higher rear masonry wall, and the installation of glass doors, restoring a suitable space for community gatherings and collective activities. The project represented an investment of BRL 109,000.

RECANTO DO SOL COMMUNITY

MILPLAN invested BRL 118,000 in the development of a multipurpose facility at Escola Municipal Genelice dos Reis Ramos Hermes in Anchieta (ES). The space hosts music, jiu-jitsu, dance, and academic support workshops, promoting students' holistic development while expanding extracurricular learning opportunities.

POLICE STATION

MILPLAN renovated the Anchieta Civil Police Station, which now houses the Specialized Women's Assistance Unit (NEAM). The facility was designed to provide a welcoming environment for women affected by violence, as well as children, adolescents, and older adults in situations of vulnerability. The renovation included painting, replacement of ceiling panels and windows, installation of ceramic flooring, and climate control through the installation of five air-conditioning units, representing an investment of BRL 154,000.



ASSOCIAÇÃO DE MORADORES UBU

MILPLAN completed a comprehensive renovation of the annex building of the Associação de Moradores UBU in Anchieta (ES), an important gathering place for the local community. Representing an investment of BRL 104,000, the project included repainting the entire facility, replacing gutters, lighting fixtures, and doors, refurbishing the exterior metal fencing, and carrying out preventive structural repairs.

TELECENTRO MÃE-BÁ

MILPLAN revitalized the Telecentro Comunitário da Comunidade de Mãe-Bá in Anchieta (ES) by providing office furniture, air-conditioning systems, IT equipment, and office supplies, ensuring the continued operation of a space dedicated to digital inclusion. The initiative represented an investment of approximately BRL 29,000.

ASSOCIAÇÃO COMUNITÁRIA DE CONDADOS

MILPLAN completed a comprehensive renovation of the headquarters of the Associação Comunitária de Condados in Anchieta (ES), including improvements to the outdoor area for community events. With an investment of BRL 172,000, the project included roof replacement, upgrades to the electrical system, repainting of the facility, repairs to doors and windows, and the preparation of an appropriate space for community activities.

PEQUENINOS DO AMOR COMMUNITY GARDEN

MILPLAN supported the implementation of the Pequenos do Amor Community Garden in Belo Horizonte (MG) by funding the project's infrastructure, equipment acquisition, and operating costs during its first 12 months. Initial soil preparation was carried out by Alvorada Ambiental, while MILPLAN's investment of BRL 34,000 helps strengthen the project's long-term self-sufficiency and sustainability.

HUMAN RIGHTS

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

MILPLAN's Human Rights guidelines are embedded in formal management instruments, including its **Code of Conduct** and Corporate Risk Matrix, which guide decision-making and support the identification, assessment, and prioritization of potential adverse impacts involving both internal and external stakeholders.

The Company adopts a structured approach to social responsibility by assigning community relations analysts to each project. Their on-site presence ensures ongoing dialogue and active engagement with local communities, strengthening the management of social impacts.

This commitment is supported by a set of institutional policies and standards designed to promote and protect human rights, including:

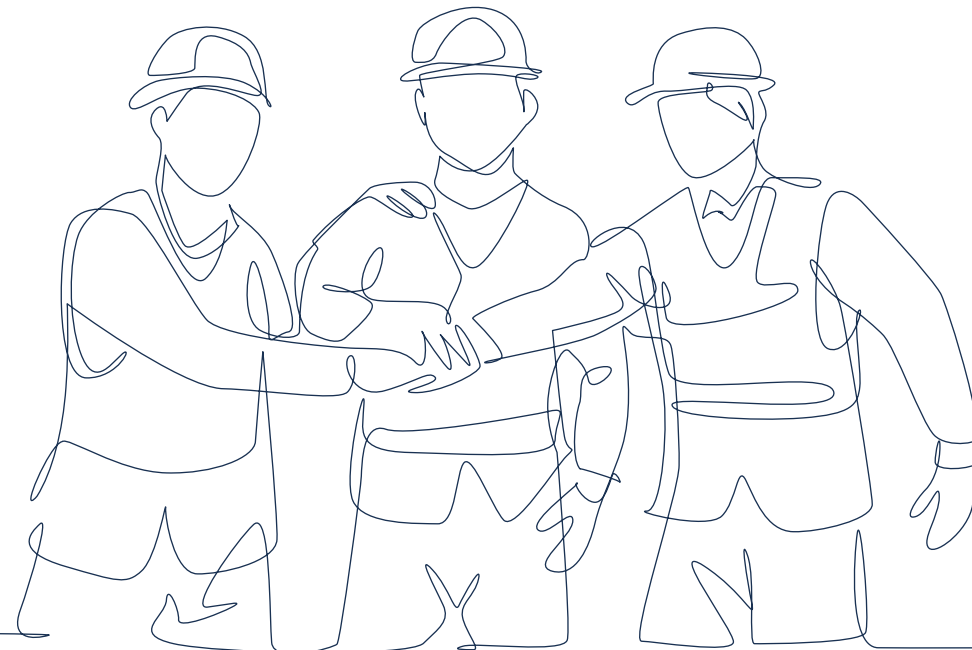
- **Code of Conduct;**
- **Consequence Management Policy;**
- **Social Responsibility Plan;**
- **Corporate Integrity Committee Internal Rules.**

To ensure the effectiveness of these guidelines, MILPLAN maintains a structured monitoring system. The Social Responsibility area reports its activities to the Corporate Integrity Committee, which oversees this topic, while data from the Ethics Channel are used as a tool for the continuous monitoring of integrity and the prevention

of potential risks. Related objectives and targets are reviewed periodically by the Corporate Integrity Committee, incorporating lessons learned and driving the continuous improvement of the Company's practices.

With respect to human rights risks, the value chain represents a significant area of focus, particularly in relationships with suppliers and service providers. To mitigate these risks, MILPLAN adopts preventive measures, including contractual provisions that prohibit child labor and forced or compulsory labor, applying these requirements to both its own operations and its business partners.

In addition, MILPLAN conducts ongoing monitoring and compliance inspections in partnership with its clients to ensure compliance with labor legislation and ethical standards. Working hours are also closely monitored, including oversight of overtime, to ensure fair working conditions and compliance with applicable labor laws.



ENVIRONMENT

Environmental Management.....	79
Emissions and Energy	81
Water.....	85
Waste and Materials.....	87

Sustainable Development Goals (SDGs):



ENVIRONMENTAL MANAGEMENT

RESPONSIBLE OPERATIONS

GRI 3-3, 2-24, 308-1, 308-2, SASB IF-EN-160a.2

MILPLAN's environmental management is integrated into its corporate strategy through its Integrated Management System (IMS), whose guidelines are established in the Integrated Management Policy and communicated throughout the organization. Implementation of the Company's environmental policies is led by senior management and process leaders, ensuring that environmental commitments are embedded in day-to-day operations and the Company's organizational culture.

These environmental principles and guidelines are implemented through standardized procedures, internal awareness campaigns, audits, and continuous monitoring processes that support impact prevention and the continuous improvement of operations. To this end, MILPLAN provides onboarding training, annual refresher courses, and on-demand training covering topics such as waste management, waste segregation, environmental aspects and impacts, chemical products, environmental permit requirements, and environmental objectives and targets. These training programs are available to all employees, and their effectiveness is assessed through participation records.

In 2025, MILPLAN strengthened its environmental management by further integrating environmental performance indicators into its corporate strategy, reinforcing the role of environmental considerations in decision-making and expanding the Environmental team's advisory

role across the organization. This increased internal alignment helped reduce operational failures and strengthen environmental controls. The effectiveness of these initiatives is monitored through both internal Integrated Management System (IMS) audits and external audits, all of which produced satisfactory results during the reporting period.

RESPONSIBLE SUPPLY CHAIN MANAGEMENT

MILPLAN has established supplier qualification and monitoring mechanisms designed to mitigate social, labor, and environmental risks throughout its value chain.

With respect to environmental criteria, all suppliers underwent the Company's qualification process in 2025. This process includes questionnaires and document reviews to assess compliance with the requirements of the Integrated Management System (IMS), which incorporates environmental management practices aligned with ISO 14001. Although the current process does not yet include a comprehensive assessment of suppliers' environmental and social impacts, MILPLAN continues to advance this agenda through the development of its **Supplier Portal**, scheduled for implementation during the first half of 2026. The initiative will strengthen supplier qualification, document management, and the assessment of social, labor, and environmental criteria.

As part of this strategy, MILPLAN also developed the **Programa Fornecedor Verde** (Green Supplier Program) in 2025, with implementation planned for 2026. The program aims to identify, qualify, and strengthen partnerships with suppliers that incorporate sustainable practices and ESG principles into their operations, products, or value chains, contributing to reduced environmental impacts and the advancement of sustainable practices throughout the supply chain.





WORLD WATER DAY

Each year, the United Nations (UN) selects a critical global theme for World Water Day. In 2025, the theme focused on glacier preservation, recognizing glaciers as the planet's largest freshwater reservoir. However, climate change and global warming are causing glaciers to melt at an accelerating rate, threatening water availability for future generations. In recognition of this important issue, MILPLAN celebrated World Water Day across its project sites on March 22, promoting awareness and encouraging the adoption of practices that contribute to water conservation and environmental protection.

WORLD ENVIRONMENT DAY

In Anchieta (ES), MILPLAN organized a community environmental awareness initiative in celebration of World Environment Day, centered on the theme "Less Plastic. More Future."

The initiative began with an awareness session held at project sites for MILPLAN employees, followed by educational activities at Escola Municipal Genelice dos Reis Ramos Hermes, located in the Recanto do Sol community. Focused on environmental awareness and encouraging sustainable practices for a better future, MILPLAN employees performed a theatrical presentation, led an interactive environmental quiz, and distributed chocolates to the students.



PATAS E TAMPAS PROJECT

To encourage waste segregation and recycling, MILPLAN organized collection drives for plastic bottle caps and PET containers with students from Escola Municipal Monsenhor Rafael, in Miguel Burnier, Ouro Preto (MG). The initiative supported *Patras & Tampas* project and Associação ASCOB, contributing both to waste reduction and to social initiatives that support animals in vulnerable situations.

MILPLAN ENVIRONMENTAL EDUCATION PROGRAM (PEAMP)

At its Tapira (MG) project, MILPLAN began implementing MILPLAN Environmental Education Program (PEAMP), designed to promote environmental awareness among employees through interactive learning. The program includes monthly awareness campaigns and weekly safety talks focused on environmental topics relevant to each project's operational activities.

EMISSIONS AND ENERGY

GRI 3-3, 302-1, 302-3, 302-4, 305-1, 305-2, 305-3, 305-4, 305-5, SASB IF-EN-410a.2

MILPLAN maintains initiatives aimed at reducing the environmental impacts associated with greenhouse gas (GHG) emissions and energy consumption by strengthening its decarbonization efforts.

To support the assessment of mitigation measures, the Company quantifies its Scope 1, Scope 2, and Scope 3 GHG emissions, using the GHG Protocol methodology and systematically consolidating data submitted by project sites to the Corporate Environmental team.

With respect to energy consumption, MILPLAN follows the energy management policies established by clients at the project sites where it operates while also adopting practices that promote responsible energy use, reduced consumption, and the prevention of waste. These controls cover the Company's headquarters, branch offices, and project administrative offices.

In 2025, electricity generated by the headquarters' solar panels reduced energy consumption by 50.8 MWh¹.

As part of its commitment to expanding the use of renewable energy, MILPLAN also established a partnership with Bulbe Energia, providing clients with easier access to clean, sustainable, and more affordable energy.

EMISSION REDUCTION AND DECARBONIZATION INITIATIVES

In 2025, MILPLAN implemented several operational efficiency measures, including the renewal of its diesel-powered heavy equipment fleet through the adoption of newer, lower-emission engines; black smoke emissions testing for diesel-powered equipment; the use of monitoring equipment powered by photovoltaic panels; the promotion of solar energy at project sites through a partnership with a clean energy provider; reducing the amount of waste sent to landfills; and increasing recycling rates.

As a result of reduced paper consumption, the expansion of remote work, and the promotion of ethanol use, Scope 1 emissions decreased by 1,791.44 tCO₂e. Scope 2 emissions declined by 2.96 tCO₂e, primarily due to the use of solar panels, while Scope 3 emissions were reduced by 911.90 tCO₂e through the diversion of project waste from landfills to recycling.

¹ In 2024, the reduction totaled 42,6 MWh

Electric Vehicle Charging Stations

A significant milestone in 2025 was the installation of complimentary electric vehicle charging stations at the Company's headquarters, encouraging corporate employees to adopt electric vehicles.



Photovoltaic Panels

One of MILPLAN's most significant decarbonization initiatives was the deployment of **solar-powered lighting towers** at its Anchieta (ES) project.

The installation of 18 solar lighting towers reduced carbon emissions by approximately 2.85 metric tons of CO₂ per day, equivalent to more than 1,000 metric tons of avoided emissions annually.

This estimate is based on the assumption that each diesel-powered lighting tower would consume approximately 60 liters of fuel per day, emitting about 158.4 kg of CO₂ daily. By replacing 18 conventional diesel-powered lighting towers with solar-powered units, the project avoided approximately 2,851 kg of CO₂ emissions per day.



The 2025 Annual HSE Workshop was 100% carbon neutral, offsetting 7 metric tons of CO₂e, more than the event's total emissions of 6.14 metric tons of CO₂e.

Carbon Offsetting

MILPLAN also offset emissions through United Nations-certified carbon credits associated with its 2025 Annual HSE Workshop, which brought together Company leaders and HSE focal points to review the year's performance and define priorities for the year ahead. Topics discussed during the event included:

- Legal aspects of Health, Safety, and Environment (HSE);
- Occupational Health as a driver of productivity;



- Environmental regulatory requirements;
- The importance of leadership in strengthening the safety culture.

The event achieved carbon-neutral status through support for the Porto do Delta Wind Power Plant project in the state of Piauí. In addition to generating renewable energy, the project contributes to educational initiatives and delivers positive environmental impacts.

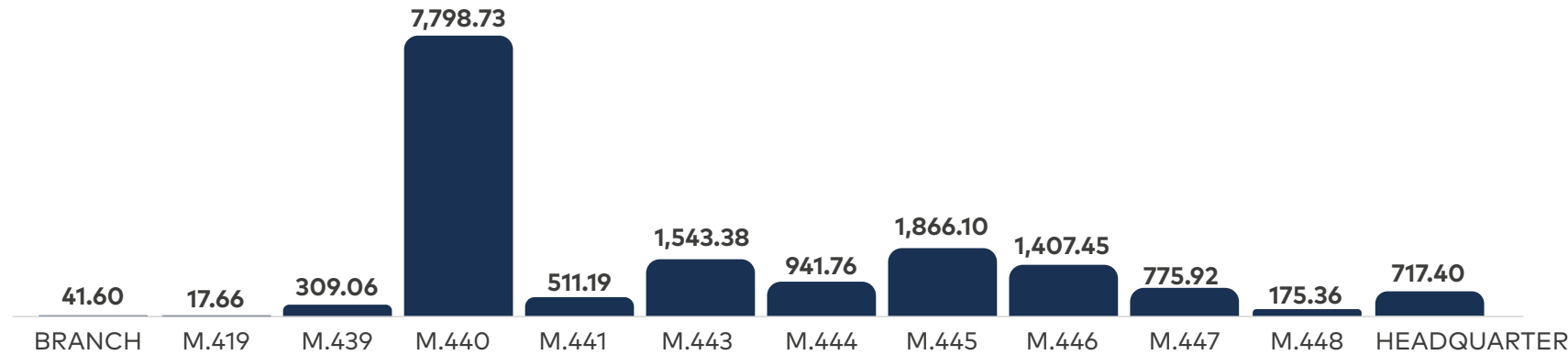
Energy Consumption Within the Organization (MWh) - GRI 302-1, 302-4

	2024	2025
Consumption from Non-Renewable Fuels		
Gasoline	898.02	1,390.22
Diesel	14,332.92	17,309.42
TOTAL	15,230.94	18,699.64
Consumption from Renewable Fuels		
Ethanol	891.74	1,348.73
TOTAL	891.74	1,348.73
Electricity		
Electricity	221.61	173.04
TOTAL	221.61	173.04
Total	16,344.29	20,221.41
Energy intensity (MWh)	2,023.33	2,022.14

Notes:

1 Energy intensity was calculated by dividing the total energy consumed within the organization by the number of Company-operated project sites in 2025 (10 project sites).

TOTAL CO₂ EMISSION BY PROJECT (tCO₂e)



GHG Inventory (tCO₂e)

	2024	2025
Scope 1		
Gross emissions	4,474.15	7,210.67
Biogenic emissions	767.45	1,289.31
TOTAL	5,241.60	8,499.98
Scope 2		
Location-based approach	10.16	11.01
TOTAL	10.16	11.01
Scope 3		
Gross emissions	4,885.91	7,594.61
Biogenic emissions	0.00	0.00
TOTAL	4,885.91	7,594.61
Total	10,137.67	16,105.60
GHG Emissions Intensity (tCO₂e)	1,267.20	1,610.56

Notes:

1 Calculations include the following greenhouse gases: CO₂, CH₄, N₂O, HFCs, PFCs, SF₆ and NF₃.

2 The consolidation approach adopted is operational control.

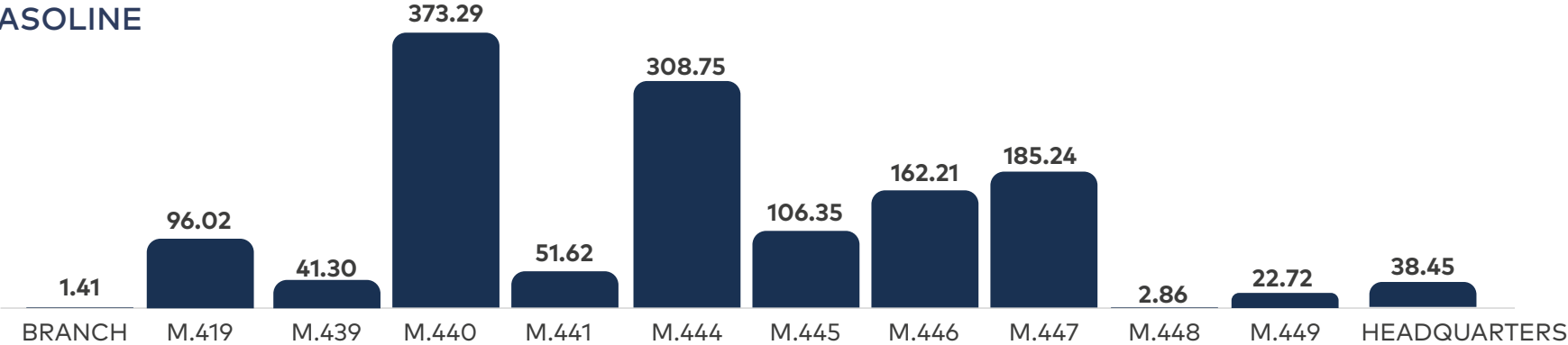
3 GHG emissions intensity was calculated by dividing total emissions by the number of Company-operated project sites in 2025 (10 project sites).

FUEL CONSUMPTION

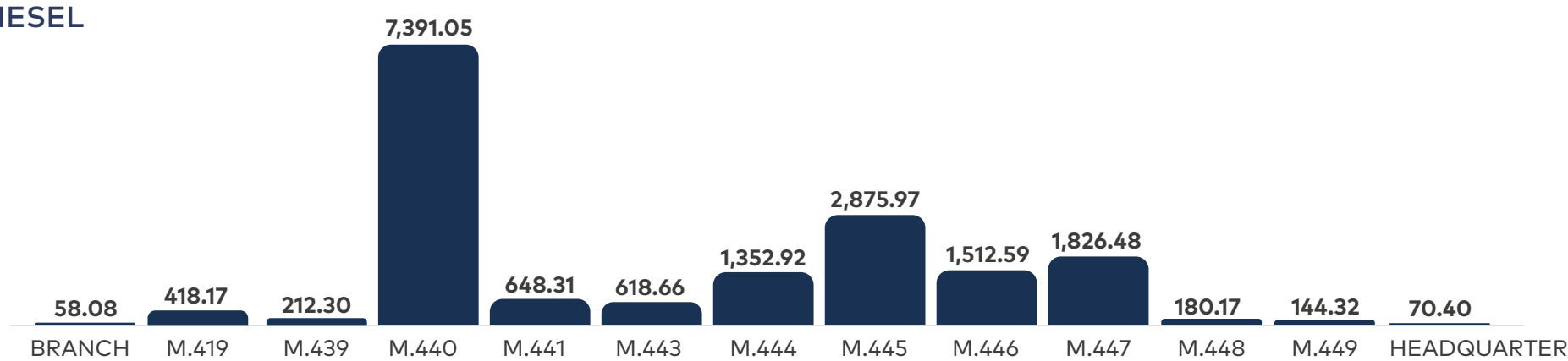
BY PROJECT (MWH)



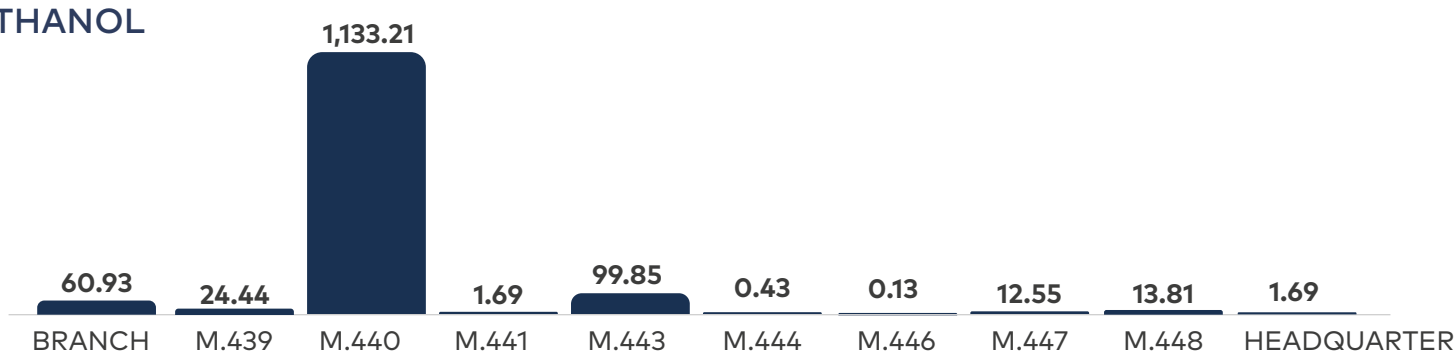
GASOLINE



DIESEL



ETHANOL



WATER

GRI 303-1, 303-3, SASB IF-EN-410a.2

At MILPLAN, water resources are primarily used to supply project sites, including water for human consumption, cleaning facilities and sanitary areas, washing equipment and components, and dust suppression on roads. Some of the water used for dust suppression, supplied by water trucks, does not return to the system, as it evaporates or infiltrates the soil. Depending on the characteristics and requirements of each project, water may be sourced from groundwater, surface water, or third-party suppliers.

At most project sites, water consumption is managed by clients, as MILPLAN operates within their industrial facilities. Nevertheless, the Environmental focal points at each project site monitor water withdrawal data on a monthly basis and submit the information for corporate consolidation. Monitoring covers water supplied by water trucks, meter readings, and utility bills. In addition to operational management, MILPLAN promotes awareness initiatives that encourage the responsible use of water and the reduction of environmental impacts among employees, clients, and neighboring communities.

The wastewater generated by operations originates primarily from restrooms, sinks, and wash areas. After use, wastewater is collected and transported by vacuum truck for treatment. The treatment process produces two main

outputs: treated water, which is reused for dust suppression on internal roads, reducing the demand for potable water; and stabilized sludge classified as inert, which is disposed of by a specialized, environmentally licensed contractor.

WATER CONSERVATION INITIATIVES

Throughout 2025, MILPLAN implemented operational improvements aimed at reducing water consumption and preventing environmental risks. At the Tapira (MG) project, sanitary facilities were modified to reuse water from hand washing sinks by redirecting it to urinals, thereby reducing potable water consumption for sanitary purposes.

At the Conceição do Mato Dentro (MG) project, a chlorination system was installed on a water truck to ensure continuous compliance with drinking water quality standards. The solution also reduced workers' exposure to chemicals, minimized the risk of falling materials, and enabled the reuse of pipes and plastic containers used in its construction.

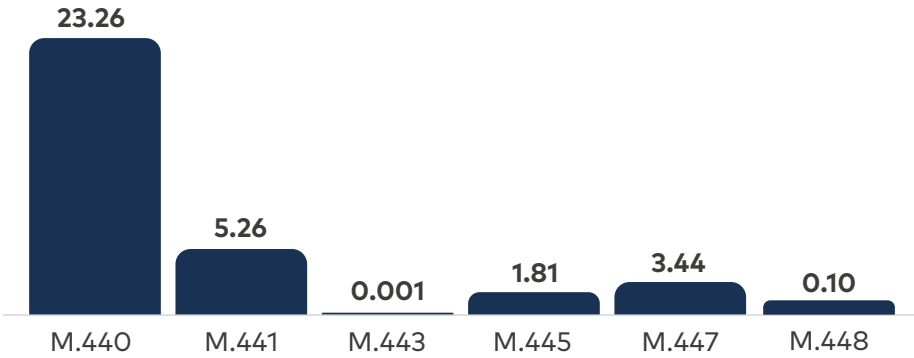
At three additional project sites, MILPLAN reused large plastic containers to collect water condensed by air conditioning systems. The recovered water was subsequently used to irrigate gardens and landscaped areas

and to wash floors. This initiative simultaneously reduced plastic waste generation and promoted more efficient water use.

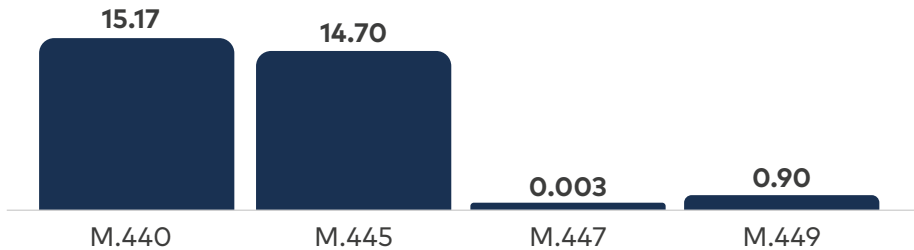


WATER WITHDRAWAL BY PROJECT (ML)

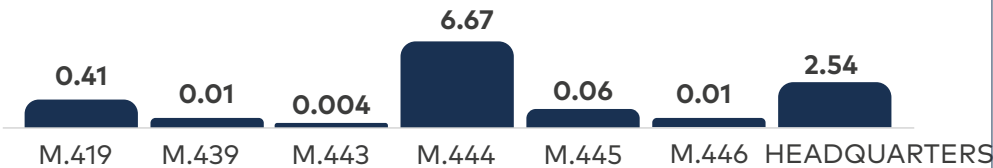
SURFACE WATER



GROUND WATER

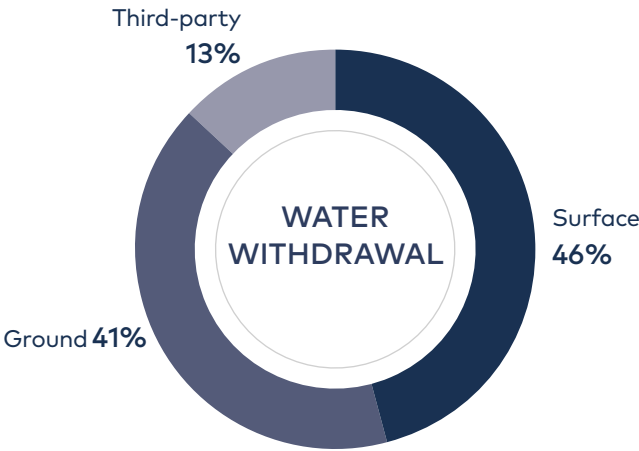
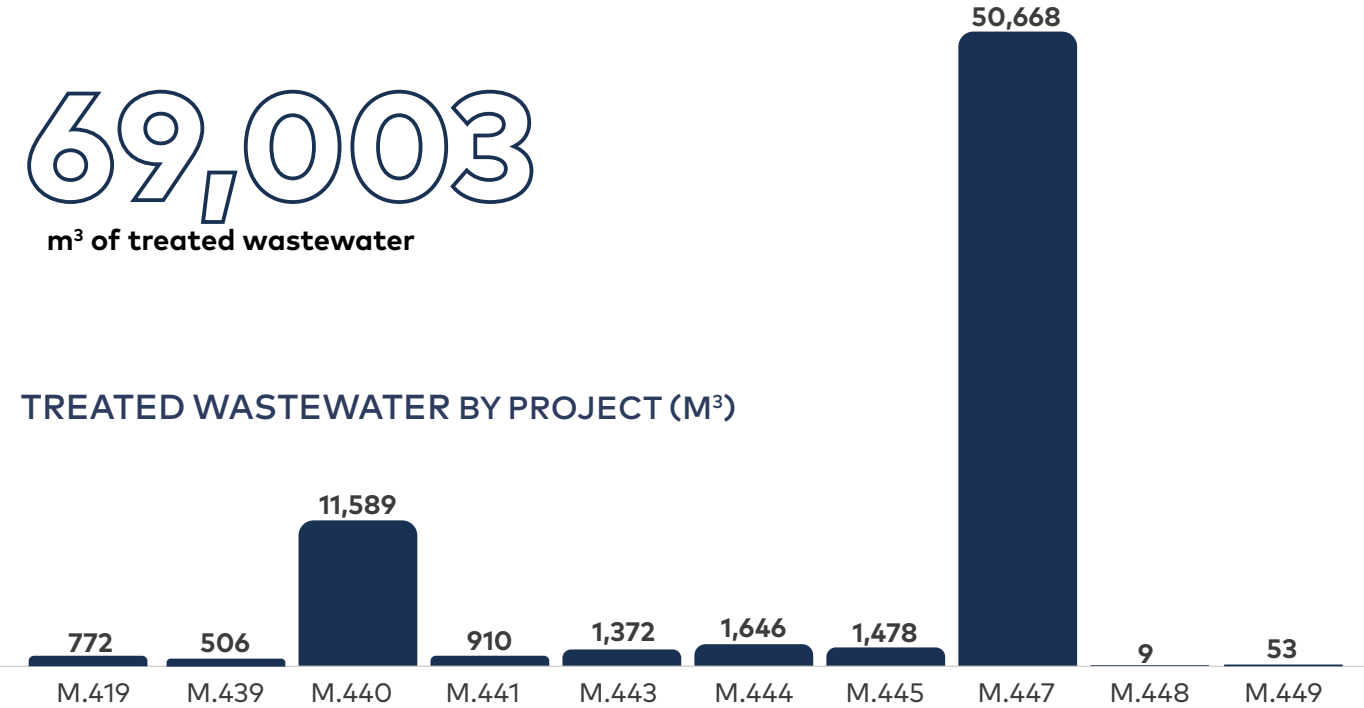


THIRD-PARTY WATER



69,003
m³ of treated wastewater

TREATED WASTEWATER BY PROJECT (M³)



Water withdrawal (ML)

	2024	2025
Third-party	5.20	9.71
Surface water	27.51	33.87
Ground water	10.01	30.77
Total	42.72	74.35

WASTE AND MATERIALS

GRI 301-1, 306-1, 306-2, SASB IF-EN-160a.2

One of the primary environmental impacts associated with MILPLAN's operations is waste generation, which occurs at various stages of its processes, particularly during industrial activities and electromechanical assembly. These operations generate industrial waste with the potential to contaminate soil and water, increase landfill use, contribute to indirect emissions, and create operational, regulatory, social, and reputational impacts.

Electromechanical assembly activities—including metal cutting, painting, equipment maintenance, and quality testing—generate waste such as paper, cardboard, plastics, construction and demolition waste, metal scrap, domestic wastewater, and materials contaminated with oil, grease, and paint.

In 2025, the increase in the number of projects resulted in a significant rise in waste generation compared with the previous reporting period. In response, waste management and pollution prevention continued to be guided by MILPLAN's Integrated Management Policy, reinforcing the Company's commitment to environmental protection, regulatory compliance, and the continuous improvement of its processes.

All units maintain a Solid Waste Management Program (*PGRS*), conduct Environmental Aspects and Impacts Assessments (*LAIA*), and hold daily awareness talks focused on waste segregation and waste reduction.

Waste management includes the control, traceability, and monitoring of waste throughout its life cycle, from generation to final disposal. Waste is segregated at the source and weighed, with monitoring supported by the Logistics and Supply Chain teams. Data consolidation is carried out by the Corporate Environmental team, and, following validation by the Environmental area, the information is reported to Executive Management.

In addition to the Solid Waste Management Program (*PGRS*), waste is managed through the Waste Transportation Manifest (*MTR*) and the Certificate of Final Disposal (*CDF*), which serve as formal mechanisms for traceability and control. Mitigation and prevention measures include employee training, the availability of waste segregation containers, dedicated waste management teams, the qualification of environmentally licensed service providers, and emergency preparedness measures such as spill response kits containing absorbent materials to contain oil leaks and prevent soil contamination.

In 2025, MILPLAN established a goal of recycling at least 25% of the waste generated by its operations. By year-end, the Company had achieved an 86% recycling rate, exceeding its target by a factor of 3.4. This performance reinforced the opportunity to establish even more ambitious targets for 2026.

In addition to waste management, MILPLAN monitors the consumption of construction materials used at its project sites, including sand¹, crushed stone¹, and timber², all procured from external suppliers according to the requirements of each project. These materials are managed through an integrated process involving the Supply Chain, Logistics, and project operations teams, with monthly reporting of consumption data to the Corporate Environmental team.

At the same time, the Company develops initiatives aimed at generating positive environmental impacts. Throughout 2025, several initiatives focused on material reuse, waste reduction, and strengthening the circular economy were implemented.

¹ Non-renewable materials

² Renewable material

Christmas Tree

At the Ouro Preto (MG) project, MILPLAN created a Christmas tree using repurposed materials, including supports from previous environmental campaigns, reclaimed wood, and decorations reused from prior years. The initiative helped reduce material disposal while reinforcing the Company's culture of sustainability.

QR Codes

At the Ouro Branco (MG) project, MILPLAN also implemented the use of QR codes to reduce paper consumption in environmental procedures and eliminate the need to transport physical documents, while improving productivity and document organization.



"Eco-Giro"

At the Tapira (MG) project, MILPLAN implemented the Eco-Giro initiative, which repurposes recycled tires for operational equipment such as transport carts, wheelbarrows, and oxy-fuel cutting equipment, reducing the environmental impacts associated with tire disposal.



Plant Pots Made from Reused Materials

At the same project, wood waste, including electrical cable reels, was repurposed to produce plant pots and landscaping structures, reducing waste and promoting the responsible reuse of materials.



ing direct ground storage with elevated storage racks, ensuring proper containment until collection and transportation to waste segregation and environmentally appropriate disposal facilities.

At the Anchieta (ES) project, rigid plastic waste was repurposed to build the countertop for the Coffee Corner, while reclaimed wood was used to construct a countertop for the women's restroom. These initiatives helped reduce waste generation while promoting sustainable practices in operational areas.

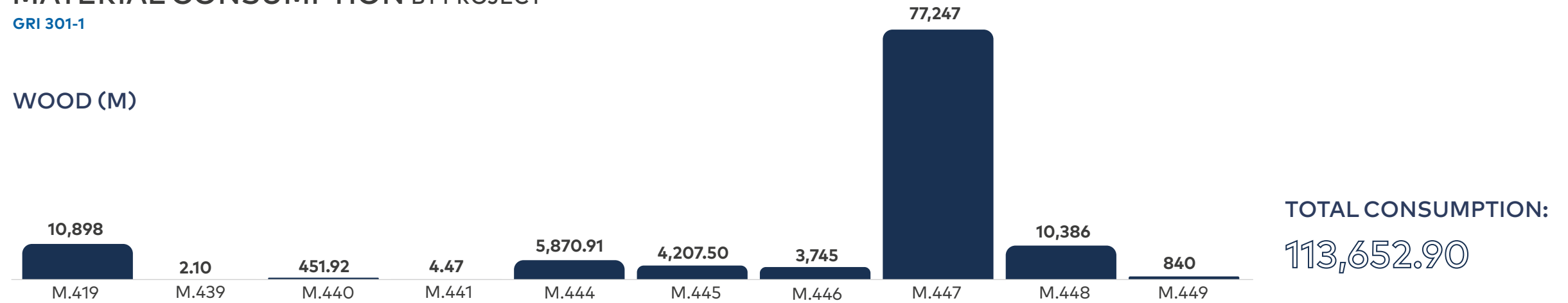
At the Canaã dos Carajás (PA) project, improvements were made to the temporary storage of Class II waste by replac-

At the same project, a temporary storage structure for Class I waste was also installed using a repurposed electrical panel cover adapted with a scaffolding base, a metal roof, and a secondary containment basin. The structure provides appropriate storage for drums containing hazardous waste in compliance with applicable environmental procedures.

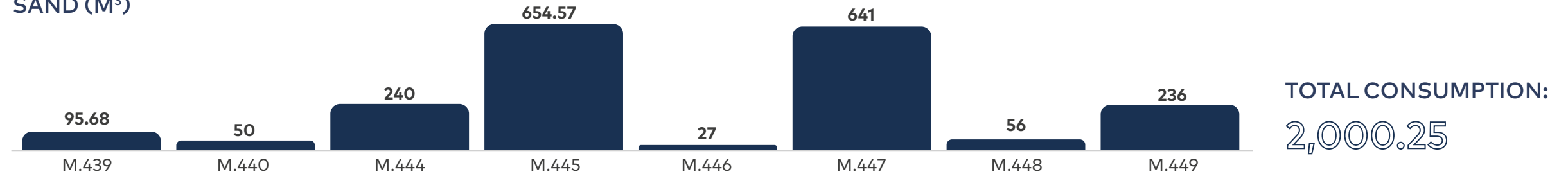
MATERIAL CONSUMPTION BY PROJECT

GRI 301-1

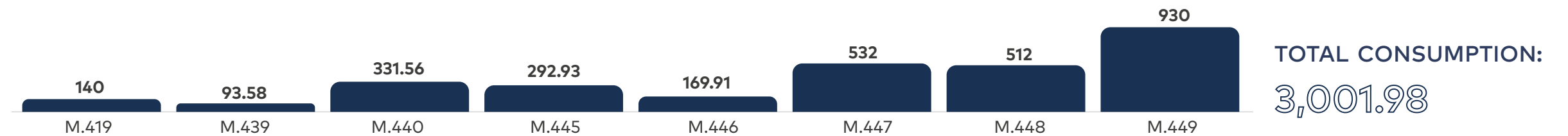
WOOD (M)



SAND (M³)



CRUSHED STONE (M³)



GRI 306-3, 306-4, 306-5

Waste generated (t)		
	2024	2025
Hazardous Waste		
Hazardous waste (materials contaminated with oil, grease, oily rags, paint, and similar substances)	131.23	371.55
TOTAL	131.23	371.55
Non-Hazardous Waste		
Organic waste	11.73	18.51
Paper and cardboard	30.54	44.70
Plastic	51.68	82.55
Scrap metal	1,096.66	7,256.59
Non-recyclable waste (general waste)	138.65	256.16
Rubber	26.20	83.61
Wood	432.50	844.44
Copper	7.51	171.04
Metal	133.69	49.68
Construction and demolition waste	352.93	3,068.50
TOTAL	2,282.09	11,875.78
Total	2,413.32	12,247.33

Waste Diverted from Disposal (t)		
	2024	2025
Non-Hazardous Waste Diverted from Disposal		
Paper and cardboard	30.54	44.70
Plastic	51.68	82.55
Copper	7.51	171.04
Scrap metal	1,096.66	7,256.59
Metal	133.69	49.68
Rubber	-	83.61
Wood	-	844.44
Construction and demolition waste	-	3,068.50
Organic waste	-	18.51
TOTAL	1,320.08	11,619.62
Waste Sent to Disposal (t)		
	2024	2025
Hazardous Waste Sent to Disposal		
Hazardous waste	131.23	371.55
TOTAL	131.23	371.55
Non-Hazardous Waste Sent to Disposal		
Organic waste	11.73	-
Non-recyclable waste	138.65	256.16
Rubber	26.20	-
Wood	432.50	-
Construction and demolition waste	352.93	-
TOTAL	962.01	256.16
Total	1,093.24	627.71

ANNEXES

GRI Content Index	92
SASB Content Index	104
Credits	106

GRI CONTENT INDEX

GRI Standards	Disclosure	Direct response	Page
GENERAL DISCLOSURES			
The organization and its reporting practices			
GRI 2: General Disclosures 2021			
	2-1 Organizational details		11
	2-2 Entities included in the organization's sustainability reporting	This report covers the activities of MILPLAN Engenharia S.A. References to consortiums are clearly identified throughout the report.	
	2-3 Reporting period, frequency and contact point		6
	2-4 Restatements of information	During the reporting period, there were no restatements of information from previous reporting periods.	
	2-5 External assurance	For this reporting cycle, the Sustainability Report was not subject to external assurance.	
	2-6 Activities, value chain and other business relationships		11, 33
	2-7 Employees		47
	2-8 Workers who are not employees	Due to the nature of its business, MILPLAN works with numerous contracted workers across different operational fronts who are essential to the success of its operations. The Company is currently developing the most appropriate approach to consolidate and report this information in accordance with the requirements of the disclosure.	
	2-9 Governance structure and composition		15 to 21
	2-10 Nomination and selection of the highest governance body		17
	2-11 Chair of the highest governance body		17

GRI Standards	Disclosure	Direct response	Page
	2-12 Role of the highest governance body in overseeing the management of impacts		17
	2-13 Delegation of responsibility for managing impacts		17
	2-14 Role of the highest governance body in sustainability reporting	MILPLAN's Sustainability Report is subject to final validation by the Company's Director of People and Management, ensuring that it reflects the Company's commitments and practices. The report is also developed with the participation of an internal team responsible for consolidating and validating the information presented.	20
	2-15 Conflicts of interest		22
	2-16 Communication of critical concerns		25
	2-17 Collective knowledge of the highest governance body		17, 20
	2-18 Evaluation of the performance of the highest governance body	The Board of Directors is not currently subject to a formal performance evaluation process.	
	2-19 Remuneration policies	The compensation policy for Board members includes fixed and variable compensation, as well as sign-on bonuses. It is based on market research conducted by an external consulting firm and benchmarking. The People and Management area is responsible for administering the policy, which is approved by senior leadership.	
	2-20 Process to determine remuneration	For the reporting period, information regarding the determination of remuneration and the annual total compensation ratio is not available. We are actively working to strengthen the necessary processes to ensure that these data can be reported clearly, consistently, and transparently.	
	2-21 Annual total compensation ratio		
	2-22 Statement on sustainable development strategy		4, 27
	2-23 Policy commitments		22, 77
	2-24 Embedding policy commitments		22, 27, 59, 79
	2-25 Processes to remediate negative impacts		25, 26

GRI Standards	Disclosure	Direct response	Page
	2-26 Mechanisms for seeking advice and raising concerns		22, 25
	2-27 Compliance with laws and regulations	During the reporting period, the Company did not identify any instances of non-compliance with laws or regulations that resulted in fines or non-monetary sanctions.	
	2-28 Membership associations	MILPLAN's CEO serves as Alternate Vice President of <i>Sinduscon</i> -MG and also serves as Coordinator of the Industrial Construction Committee at <i>FIEMG</i> .	
	2-29 Approach to stakeholder engagement	MILPLAN seeks to build relationships based on ethics, transparency, and value creation. Guided by principles set forth in its Code of Conduct, the Company maintains a close and structured relationship with its stakeholders, including employees, local communities, suppliers, clients, labor unions, government authorities, and public and private institutions. A dedicated Corporate Communications area is responsible for strengthening dialogue and fostering strategic partnerships.	
	2-30 Collective bargaining agreements	MILPLAN ensures that 99.4% of its employees are covered by collective bargaining agreements. The only exceptions are interns and apprentices, who are not included because they are not employees.	
GRI 3: Material Topics 2021			
	3-1 Process to determine material topics		28
	3-2 List of material topics		28
	3-3 Management of material topics: Occupational Health and Safety		59
	3-3 Management of material topics: Talent Attraction and Retention		49
	3-3 Management of material topics: Environmental Management		79
	3-3 Management of material topics: Decarbonization		81
	3-3 Management of material topics: Community Relations		75
	3-3 Management of material topics: Ethics and Compliance		22

GRI Standards	Disclosure	Direct response	Page
	3-3 Management of material topics: Economic Performance		30
	3-3 Management of material topics: Human Rights		77
ECONOMIC DISCLOSURES			
	201-1 Direct economic value generated and distributed		30
GRI 201: Economic Performance 2016	201-3 Defined benefit plan obligations and other retirement plans	MILPLAN offers its employees the opportunity to enroll in a private pension plan administered by a financial institution, reinforcing its commitment to employees' financial security and long-term planning. Contributions range from 2% to 5% of the employee's gross salary, depending on the salary bracket established under the plan, ensuring proportionality and fairness in the benefit provided.	
	201-4 Financial assistance received from government	MILPLAN allocates a portion of its tax liabilities to initiatives that promote social development, culture, sports, and innovation through the use of tax incentives. In 2025, the Company allocated BRL 1,425,080.00 to the Workers' Food Program (PAT); BRL 2,720,000.00 to projects supported through incentive mechanisms such as the Rouanet Law, the Municipal Fund for the Rights of Children and Adolescents (FMDCA), the Sports Incentive Law, and the Municipal Fund for Older Adults (FMI); and BRL 1,321,471.50 under the <i>Lei do Bem</i> , which promotes research and technological innovation in Brazil.	
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	In 2025, Brazil's national minimum wage was BRL 1,518.00. At MILPLAN, the lowest wage paid to both men and women was BRL 1,619.00, equivalent to 1.066 times the national minimum wage, reinforcing the Company's commitment to pay equity and fair compensation. MILPLAN also maintains a structured document verification process for third-party service providers, requiring periodic evidence of compliance with labor obligations, including compensation consistent with the national minimum wage and the minimum wage levels established under applicable collective bargaining agreements.	
	202-2 Proportion of senior management hired from the local community	All members of MILPLAN's Executive Board are professionals from Belo Horizonte, Minas Gerais, where the Company's headquarters are located.	

GRI Standards	Disclosure	Direct response	Page
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported		66, 75
	203-2 Significant indirect economic impacts		66, 75
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers		34
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption		24
	205-2 Communication and training about anti-corruption policies and procedures		22, 23, 24
	205-3 Confirmed incidents of corruption and actions taken		24
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	No legal actions related to anti-competitive behavior were recorded during the reporting period.	

GRI Standards

Disclosure

Direct response

Page

GRI 207: Tax 2019

207-1 Approach to tax

MILPLAN conducts its tax activities in compliance with applicable municipal, state, and federal tax legislation. Its tax strategy is supported by the continuous training of the responsible team, technical validation of transactions by external tax specialists, and oversight by the Finance Department, with final approval by the Board of Directors. The tax strategy is reviewed annually, or whenever necessary, to reflect regulatory and operational changes.

The Company also maintains tax compliance monitoring and control mechanisms, including the periodic issuance of tax clearance certificates, internal controls over the tax calendar, and support from specialized consulting firms and legal advisors for specific tax matters. Whenever necessary, formal consultations are conducted with the relevant regulatory authorities.

In 2025, MILPLAN further strengthened its tax governance by implementing monthly independent audits of tax calculations, with quarterly reports submitted to the Board of Directors for review. In addition, the Company remains subject to independent external audits that assess the compliance of its tax processes with applicable legislation.

MILPLAN's tax approach is aligned with its business strategy and long-term value creation, recognizing taxation as a key factor in maintaining competitiveness and the financial sustainability of its operations. In this context, the Estimating, Commercial, and Controllershship areas work collaboratively to balance operational efficiency with tax compliance.

MILPLAN also allocates resources through tax incentives to initiatives that generate social, cultural, and socioeconomic value, including projects supported by the Fund for the Rights of Children and Adolescents, the Fund for Older Adults, and the Rouanet Law. All information presented covers 100% of the Company's operations.

GRI Standards	Disclosure	Direct response	Page
GRI 207: Tax 2019	207-2 Tax governance, control, and risk management	MILPLAN's tax management is overseen by the Controllershship Department under the leadership of the Chief Financial Officer (CFO), in alignment with the strategy approved by the Board of Directors. The tax function works in an integrated manner with the Company's other departments, providing targeted training based on each area's specific needs and encouraging team members to participate in external training programs, particularly those related to Brazil's tax reform. The structure is also supported by specialized legal counsel for the assessment of tax matters.	
		Tax risks are continuously monitored through document reviews, ongoing monitoring of applicable tax legislation, and oversight of the Company's tax compliance status. Transactions undergo prior review and are supported by internal controls designed to ensure compliance and mitigate tax risks. MILPLAN adopts a conservative approach to tax management, validating specific tax strategies through legal opinions issued by independent law firms.	
		In addition, the Company conducts annual external audits, including preliminary and final reviews of its tax calculations. Complementing this governance framework, MILPLAN maintains an Ethics Channel through which employees and other stakeholders can safely report unethical or illegal conduct, reinforcing the Company's commitment to ethics, compliance, and transparency.	
		MILPLAN expects its employees to conduct their interactions with tax authorities in a transparent, ethical, and compliant manner. All tax-related activities are carried out in accordance with applicable legislation, which serves as the primary reference for addressing internal tax matters. Whenever more specialized assessments are required, the Company relies on the support of external tax advisors.	
	207-3 Stakeholder engagement and management of concerns related to tax	The Company does not participate in public policy initiatives related to taxation, focusing instead on the responsible management of its tax obligations. Tax-related matters and internal perspectives are reviewed through periodic meetings involving the relevant departments, the Chief Financial Officer (CFO), and the Board of Directors.	
		MILPLAN is committed to maintaining full compliance with 100% of its primary tax obligations and ancillary tax filing requirements related to operating revenue. Other tax obligations are managed on an ongoing basis as they arise and become applicable.	

GRI Standards

Disclosure

Direct response

Page

GRI 207: Tax 2019

207-4 Country-by-country reporting

- a. Tax jurisdiction: Brazil.
- b. i. Name of the resident entity: MILPLAN Engenharia S.A.
- ii. Primary activities of the organization: The Company's principal business activities are:
 - Civil construction and electromechanical assembly of industrial facilities and complexes;
 - Engineering services related to the civil construction and electromechanical assembly of industrial facilities and complexes;
 - Maintenance of industrial facilities and complexes;
 - Structural steel erection;
 - Construction of water supply, sewerage, and related infrastructure systems;
 - Construction of pipeline transportation systems;
 - Port, marine, and waterway construction works;
 - Earthworks, foundation, and masonry works;
 - Equipment rental;
 - Project management and technical consulting for industrial facilities and complexes;
 - Combined office and administrative support services.
- iii. Number of employees and the basis used for calculating this number: 8,436 employees during fiscal year 2025.
- iv. Revenues from sales to third parties: BRL 1,266,988,107.
- v. Revenues from intra-group transactions with other tax jurisdictions: None.
- vi. Profit before tax: BRL 246,129,943.
- vii. Tangible assets other than cash and cash equivalents: BRL 112,645,615.
- viii. Corporate income tax paid on a cash basis: Corporate income taxes are recognized on an accrual basis rather than on a cash basis.
- ix. Corporate income tax accrued on profit: BRL 75,765,284.
- x. Reasons for the difference between corporate income tax accrued on profit and the tax due if the statutory tax rate were applied to profit before tax: The income tax recognized in profit or loss represents the amount calculated on the Company's taxable profit for fiscal year 2025. The amount presented as a liability represents the outstanding balance of this tax after deducting payments made during the reporting period.
- c. Reporting period covered by the information disclosed under Disclosure 207-4: Fiscal year 2025.

GRI Standards	Disclosure	Direct response	Page
---------------	------------	-----------------	------

ENVIRONMENTAL DISCLOSURES

GRI 301: Materials 2016	301-1 Materials used by weight or volume		87, 89
GRI 302: Energy 2016	302-1 Energy consumption within the organization		81, 83
	302-3 Energy intensity		81
	302-4 Reduction of energy consumption		81, 83
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource		85
	303-3 Water withdrawal		85
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions		81
	305-2 Energy indirect (Scope 2) GHG emissions		81
	305-3 Other indirect (Scope 3) GHG emissions		81
	305-4 GHG emissions intensity		81
	305-5 Reduction of GHG emissions		81
	306-1 Waste generation and significant waste-related impacts		87
GRI 306: Waste 2020	306-2 Management of significant waste-related impacts		87
	306-3 Waste generated		90

GRI Standards	Disclosure	Direct response	Page
GRI 306: Waste 2020	306-4 Waste diverted from disposal		90
	306-5 Waste directed to disposal		90
SOCIAL DISCLOSURES			
GRI 401: Employment 2016	401-1 New employee hires and employee turnover		51
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees		49
	401-3 Parental leave	With the exception of interns and apprentices, all MILPLAN employees are entitled to parental leave. In 2025, 11 female employees took maternity leave. Of the six employees scheduled to return during the reporting period, all returned to work, resulting in a 100% return-to-work rate among women. Among men, 68 employees took paternity leave, and all returned to work during the same year, resulting in a 100% return-to-work rate.	
GRI 402: Labor/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	MILPLAN has an operational procedure for Change Management that establishes guidelines for identifying, assessing, approving, implementing, and monitoring changes that may affect the Company's operations, contracts, Integrated Management System (IMS), or Enterprise Resource Planning (ERP) system. The process involves multidisciplinary committees responsible for evaluating the risks, opportunities, and impacts associated with proposed changes, ensuring they are planned, controlled, and documented, with a focus on safety, legal compliance, process integrity, and continuous improvement.	
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system		59
	403-2 Hazard identification, risk assessment, and incident investigation		59

GRI Standards	Disclosure	Direct response	Page
GRI 403: Occupational Health and Safety 2018	403-3 Occupational health services		65
	403-4 Worker participation, consultation, and communication on occupational health and safety		60
	403-5 Worker training on occupational health and safety		62
	403-6 Promotion of worker health		65
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		60
	403-8 Workers covered by an occupational health and safety management system		59
	403-9 Work-related injuries		62
	403-10 Work-related ill health	No cases of occupational illness were recorded during 2025.	
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Training hours related to occupational health and safety are not yet tracked by employee category and gender, making it impossible to report this information in accordance with the disclosure requirements. MILPLAN remains committed to improving this process for future reporting cycles.	52
	404-2 Programs for upgrading employee skills and transition assistance programs		52
	404-3 Percentage of employees receiving regular performance and career development reviews		55
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees		17, 47, 48, 56
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	During the reporting period, no substantiated incidents of discrimination involving MILPLAN were recorded.	

GRI Standards	Disclosure	Direct response	Page
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	In 2025, no significant risks related to child labor or forced or compulsory labor were identified in MILPLAN's own operations or among its direct suppliers.	77
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor		77
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	During the reporting period, no incidents involving violations of the rights of Indigenous Peoples were identified.	
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs		66
	413-2 Operations with significant actual and potential negative impacts on local communities		75
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria		79
	308-2 Negative environmental impacts in the supply chain and actions taken		79
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria		79
	414-2 Negative social impacts in the supply chain and actions taken		79

SASB CONTENT INDEX

Topic	Code	Accounting metric	Page	Direct response
Engineering and Construction Services				
Environmental Impacts of Project Development				
	IF-EN-160a.1	Number of incidents of non-compliance with environmental permits, standards, and regulations		No incidents of non-compliance with environmental permits, standards, or regulations were recorded during the reporting period.
	IF-EN-160a.2	Discussion of processes to assess and manage environmental risks associated with project design, siting, and construction	79, 87	
Workforce Health and Safety				
	IF-EN-320a.1	(1) Total recordable incident rate (TRIR) and (2) fatality rate for (a) direct employees and (b) contract employees	62	
Lifecycle Impacts of Buildings and Infrastructure				
	IF-EN-410a.2	Discussion of process to incorporate operational-phase energy and water efficiency considerations into project planning and design	81, 85	

Topic	Code	Accounting metric	Page	Direct response
Business Ethics				
	IF-EN-510a.2	Total amount of monetary losses as a result of legal proceedings associated with charges of (1) bribery or corruption and (2) anti-competitive practices		No monetary losses resulting from legal proceedings related to charges of bribery, corruption, or anti-competitive practices were recorded during the reporting period.
	IF-EN-510a.3	Description of policies and practices for prevention of (1) bribery and corruption and (2) anti-competitive behavior in the project bidding processes	22, 24	
Activity Metrics				
	IF-EN-000.A	Number of Active Projects – Active projects are defined as construction and infrastructure projects under development for which the Company provided services during the reporting period, including both the design and construction phases. Active projects exclude projects awarded during the reporting period.	13	
	IF-EN-000.B	Number of Completed Projects – Completed projects are those considered ready for operation during the reporting period. The scope of completed projects includes only projects for which the Company provided construction services.	13	

CREDITS

CORPORATE INFORMATION

Headquarters address:

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

Contact e-mail:

responsabilidade.social@milplan.com.br

CEO:

Leonardo Guimarães Mendes

REPORT PRODUCTION

Coordination:

Bárbara Marques

Review:

Marcos Marangoni

**Consulting, Editorial Design, Graphic Design, and
Translation:**

Ricca Sustentabilidade

Photography:

Bruno Gonzaga and MILPLAN archive

CONTRIBUTORS

Américo Giannetti, Andrei Dupin, Bruno Estanislau,
Bruno Mafaldo, Cleidver Moraes, Danielle Nunes, Dimas
Costa, Donizetti Sales, Eduardo Savini, Isabela Pádua,
João Santos, Leonardo Mendes, Luiz Bellato, Matheus
Machado, Marcelo Paiva, Marcos Marangoni, Mônica
Veríssimo, Olintho Neto, Paulo Wanner, Rodrigo Guzzo,
Thiago Guimarães, Yolanda Guimarães, Waleska
Santos e Willian Furbino.

