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PLAY CONSTRUCTOR

Code of Conduct

Applicable to Operations in Brazil and the European Union

European Entity Registered in Estonia

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1. Introduction

Play Constructor operates in Brazil and is expanding into Western Europe through its Estonia-based entity.

This Code establishes mandatory ethical, legal, safety, and environmental standards applicable to all directors, employees, contractors, and business partners.

2. Legal and Regulatory Compliance

Play Constructor complies with all applicable laws in Brazil and the European Union.

Key legal frameworks include:

- Brazil: Federal Constitution, CLT (Consolidation of Labour Laws), Anti-Corruption Law (Law 12.846/2013), Environmental Crimes Law (Law 9.605/1998), LGPD (Law 13.709/2018).
- European Union:
 - Directive 2014/24/EU (Public Procurement)
 - Directive 2014/25/EU (Utilities Procurement)
 - Directive 2019/1937/EU (Whistleblower Protection)
 - Directive 2011/92/EU (Environmental Impact Assessment)
 - Directive 2008/98/EC (Waste Framework Directive)
 - Regulation (EU) 2016/679 (GDPR – General Data Protection Regulation)
 - Directive 89/391/EEC (Occupational Safety and Health Framework Directive)
 - Estonian national transposition laws applicable to construction and corporate governance.

Where multiple jurisdictions apply, the stricter standard shall prevail.

3. Anti-Bribery and Corruption

Play Constructor maintains zero tolerance for bribery and corruption.

- No offering, giving, requesting, or accepting bribes.
- No facilitation payments.
- No undisclosed commissions or kickbacks.
- No improper political contributions.

This policy aligns with Brazil's Anti-Corruption Law (12.846/2013) and EU anti-corruption standards.

4. Fair Competition and Public Procurement Integrity

- No bid-rigging or collusion.
- No price-fixing or market allocation agreements.

- Full compliance with EU competition law (Articles 101 and 102 TFEU).

All participation in EU public tenders must comply with Directive 2014/24/EU.

5. Health, Safety and Wellbeing

Safety is a core operational requirement.

- Compliance with Brazil NR standards and EU Directive 89/391/EEC.
- Risk assessments (RAMS) required for all projects.
- Mandatory PPE usage.
- Stop Work Authority for unsafe conditions.

6. Environmental Responsibility

- Compliance with Brazilian environmental legislation and EU Environmental Directives.
- Waste management aligned with Directive 2008/98/EC.
- Environmental Impact Assessments where required under Directive 2011/92/EU.

7. Human Rights and Labour Standards

- No forced labour, child labour, or human trafficking.
- Compliance with ILO conventions.
- Respect for diversity and non-discrimination.
- Fair wages and lawful working hours.

8. Data Protection and Confidentiality

- Compliance with GDPR (EU Regulation 2016/679).
- Compliance with Brazil LGPD (Law 13.709/2018).
- Immediate reporting of data breaches.

9. Responsible Supply Chain

- Third-party due diligence required.
- Contractual compliance clauses mandatory.
- Right to audit suppliers and subcontractors.

10. Speaking Up and Whistleblowing

- Confidential reporting channels available.
- Protection against retaliation.
- Compliance with EU Directive 2019/1937/EU.

11. Enforcement and Disciplinary Measures

Violations may result in disciplinary action, contract termination, and legal proceedings.

