

ETHICAL CODE AUBAY PORTUGAL, S.A.



aubay
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Policy

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1.0	10/04/2023	Initial version Policy (Directive) Ethical Code English version	Tiago Barata
2.0	21/11/2023	Change in the description of the Information Security Classification – Confidential. Changed the classification from “Sensitive” to “Restricted”	Tiago Barata

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	Code: DIR_LEG_11	Title: Ethical Code			
	Author: Tiago Barata	Approved: João Bexiga/CEO	Date of entry into force: 10/04/2023	Version: 02	Page 4

I. Purpose (what/why?)

This Ethical Code establishes the ethical principles and generic actions in which Aubay Portugal S.A. is committed, applicable to all employees and services providers in the development of our professional practice.

II. Scope (what? who? when? where?)

Applicable to all employees and services providers from Aubay Portugal S.A.

III. Definitions

Not applicable

IV. Roles and responsibilities

Not applicable

V. Rules/ How to proceed (How?)


PREAMBLE:

This present Ethical Code establishes the ethical principles and generic actions in which Aubay Portugal S.A. is committed, applicable to all employees and services providers in the development of our professional practice.

The Aubay Portugal, S.A. disposes of Conduct code that is equally applicable to all employees and services providers from Aubay Portugal S.A., independent of its subsidiary, where is defined your fundamental principles of our commercial actions, in specific situations it's guided by principles of integrity, honesty and confidentiality.

Thus, the Ethical and Conduct Codes are complementary in case of doubts of which conduct the Aubay Portugal S.A. should be taken, always support by the help tools and the board that was implemented, namely Ethics Committee.

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The commercial ethical behavior it's an essential requirement to guarantee and safeguard the balance of the stakeholder rights and the society in general, being indispensable to guarantee the commercial objectives.

The ethical behavior obligates the fulfillment of the legal norms and regulations in force, as well the internal norms and conduct and good practical codes which are voluntarily adopted.

This present document is subject to revision and its available for consult.

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SCOPE OF APPLICATION:

This present Ethical Code is applicable to all employees and services providers.

Each employee and provider must adopt the example behavior within the Aubay Portugal S.A. refrain from some behavior against of our behavioral rules which is defined in this Ethical Code, and the other norms, as the anticorruption politics and the Aubay Portugal S.A. Internal regulation. These documents are available for consultation by all employees and providers from Aubay Portugal S.A.


Consequently, all the employees and providers of Aubay Portugal S.A. are subject to compliance with the law, commercial regulations, and procedure of the business, and their actions must be adjusted to the Aubay Portugal S.A. values and principles as well the objectives and commitments from this code.

Any question or situation that is placed by a collaborator about the application of this code or interpretation about this document, must be taken to their hierarchical superior, who will try to resolve this specific matter internally.

The principles of integrity, honesty and confidentiality must constitute the reference and inspire the conduct of all employees and providers from Aubay Portugal S.A., namely when:

- They are carrying out commercial operations, as well as any other activity with honesty, professional integrity, and transparency.
- Fulfill and enforce the law and applicable internal norms and any other that, voluntarily is internally adopted by the Company.

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- Must keep the proper diligence for the prevention, detection, and eradication of irregular conducts.

ETHICAL AND RESPONSIBLE ACTUATION:

The Aubay Portugal S.A. has with a principle and commitment treating with dignity, respect, equality, and justice all people who develop your activities in the company and the areas of interest.


Also, the Aubay Portugal S.A adopts the United Nations Global Compact, for what it assumes as it is own the respect to principles of human rights, labor, environmental and anticorruption rights. These principles govern this code.

The Company guarantees:

- The labor conditions are safe and healthy to all employees and providers of Aubay Portugal S.A.
- The Labor environment is free of any type of violence, harassment, or abuse at work, keeping the procedures of prevention, detection, and eradication of this type of conducts.
- The professional development and qualification to all employees and providers from Aubay Portugal S.A.
- It's not allowed any type of forced labour or the use of child labour.

So, the company requires to all the employees and providers from Aubay Portugal, S.A. to:

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- Protects and make better the good image and business reputation of the Aubay Group, using their functions in a professional, ethical, and responsible way.
- Fulfill and enforce the law and applicable internal norms and any other actuation and behavioral norm the Aubay Portugal S.A. and the Aubay Group assumes as their own.
- Treat colleagues with dignity, respect, equality, and justice, without consenting any discrimination.
- Promote a free labor environment to any violence, harassment, and abuse.
- Inform, by any middle established, all the situations against the values and principles from Aubay Portugal S.A. and the Aubay Group.
- Make good use of the material and technical equipment that are disposal to them.
- Must have attention to the defense of interests from Aubay Portugal S.A. and the Aubay Group in the performance of the labor activities.
- Respect, protect and help their own industrial and intellectual property and from the others.
- Exercise their activity in a good physical condition, that means not affected by the consume of substances that hinder good professional performance.

A. Clients:

In the contact with its clients, Aubay Portugal S.A., establishes as the fundamental pilar of your commercial policies the guarantee of maximum customer satisfaction and offering the highest service level, specialization, quality and guarantee through the services offer which optimize your decision in our contraction, in accordance with their needs and interests.

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Thus, all the employees and providers from Aubay Portugal S.A. must be guided acting with responsibility, commitment, and maximum respect, with the priority achieve the excellence regarding the client, with the quality and safety of the services provided.

B. Suppliers and partners:

The relationship with the suppliers and partners from Aubay Portugal S.A. must be promoted with cooperation and transparency that allows and facilitates the realization of mutual objectives, permanently in accordance with the legislation in force.


Likewise, all the employees and providers from Aubay Portugal S.A. must collaborated exclusively with the suppliers and partners which respect the dignity of people and the human rights, also comply with the laws in force as well as accepting all the Aubay Group codes and internal regulations, preventing the reputation of the same from being prejudiced.

C. External Entities: Public Entities:

All the employees and providers from Aubay Portugal S.A. must related and interact with the most diverse external entities, namely the public authorities and institutions, in a lawful and respectful manner, in accordance with the principle of cooperation and transparency.

No employee or provider from Aubay Portugal S.A. will make payments to facilitation payments to expedite procedures in cash or any other object of value, before any judicial body, public administration, or official entity, in accordance with the law and

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the internal Anticorruption and Conduct Code, under penalty of the consequences contained therein.

ETHICAL PRINCIPLES:


Without any prejudice of the existence of other principles for which all employees and providers of Aubay Portugal S.A. should be guided by the fundamental pillars of conduct which are:

Principle of Integrity: The Aubay Group doesn't accept or offer, directly or indirectly, any type of advantage with a dubious nature of offers to obtain any type of economic or commercial benefits. No employee or provider of Aubay Portugal S.A. will accept or offer any type of gift, prize or donation, reception, or exchange of favors.

Any request or offer with this type of meaning must follow all the procedures and requirements established in the Conduct and Anticorruption Codes, under penalty of applying the consequences contained in these documents.

Principle of Transparency: The conduct of the employees and providers of Aubay Portugal S.A. must be constituted by explicit truth, with honesty and must prioritize communication, within the limits allowed by Aubay Portugal S.A. professional and business secrecy. The transparency of the actions of all employees and providers from Aubay Portugal S.A. can't, any time, be called into question, and must, if necessary, establish limits in relations with clients and suppliers, report the principles by which the company is guided before the public in question, among others.

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The principle of transparency that must guide Aubay Portugal S.A. it also applies to all existing information within the company, as this must reflect the reality of the situation it reports, namely financial information, accounting information, contracts, and auxiliary documentation transversal to all departments.

Therefore, its guarantee that all employees and providers of Aubay Portugal S.A. undertake that information, in the elaboration of which they participate, is complete, true, and reliable.

Principle of Fair Competition: The Aubay group and Aubay Portugal S.A. believes in honest, fair, and loyal competition. Under no circumstances is any deceitful, fraudulent, or malicious behavior will be allowed.

In this way, the company undertakes to carry out, through its employees and providers, operations according to the principles of healthy competition and in accordance with all the rules and regulations in force.


That said, the employees and providers of Aubay Portugal S.A. will not carry out commercial practices that are abusive or unfair and will avoid arousing the interest of clients of other competitors using inappropriate, abusive, unfair, or illicit methods.

CONFIDENTIALITY COMMITMENT AND CONFIDENTIALITY:

All the employees and providers from Aubay Portugal S.A., undertake to:

- Keep the maximum confidentiality and secrecy regarding the information they have and to which they have access, whatever financial, commercial and/or technological

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- Keep the maximum confidentiality and protects the personal data that is processed about the employees, providers, administrators, clients, suppliers, and all those for whom special protection is required by law.
- Take the greatest care to differentiate and not create confusion between the expression of your personal opinions and criteria, and the transmission and dissemination of criteria, guidelines, instructions and/or Aubay Portugal S.A. standards.
- They must refrain from giving, through any means of communication (e.g. social networks, opinion forums and any other information medium) opinions, data, performance criteria, uses and/or internal procedures, which correspond to those of the Aubay Group , from Aubay Portugal, S.A. or any of its companies or customers, or that implies that they belong to them, their directors, executives, area managers and/or employees, except for situations in which it is expressly requested, in writing, that information be transmitted to them by a person authorized for that purpose;
- They must not adopt any behaviors or activities that may give rise to a personal benefit, direct or indirect, or any conflict of interest (personal, family, other related parties, another employee, supplier, client, or partner company).

This commitment of confidentiality and the duty of secrecy will continue, even if the bond between the Aubay Portugal S.A. and the employee or provider cease, ensuring the integrity, good faith, and honesty by which the Parties are guided.

RESPONSIBILITY AND OBLIGATION TO INFORM:

The non-compliance with the provisions of this Code, as well any other internal norm from the Groupe, may result in the application of sanctions, in accordance with the provisions of la and the aforementioned documents.

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All the employees and providers of Aubay Portugal S.A. have the obligation to inform about any irregularity regarding compliance with the internal Codes, as well as any circumstance in which a third party may refer to himself or another employee or provider as having violated the internal Codes and Regulations.

Any violation of this Code or other internal documents of Aubay Portugal, S.A. can be reported through the Reporting Channel created for this purpose, which is generally known and clearly identified in the Code of Conduct.

VI. Security information Classification

Classificação	Descrição	Assinalar com X
Public	All information that can be consulted by employees of the organization, customers, suppliers, service providers and the general public	
General (Aubay employees)	It is all information that can be consulted by all employees of the organization in general.	X
Internal (Internal Team)	It is all information that can only be consulted by employees of the internal team.	
Restrict	It is all information that can be consulted by a restricted group of employees and/or by the organization's partners. Examples: Unpublished source code and intellectual property. ITC system design & configuration information.	
Confidential	It is all information that can be consulted by a restricted group of employees and/or by the organization's partners. Examples: Data subject to regulatory control not subject to disclosure due to legal and/or fiscal commitments. Information about employee relationships. Employee HR data	

VII. Related documentation

Conduct Code

VIII. Anexes

Not applicable

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