

# CODE OF ETHICS AND GOOD CONDUCT

## 03 - 06

1. PURPOSE
2. LEGAL BASIS
3. OUR VALUES

## 07 - 14

### 4. INITIAL CONSIDERATIONS

- 4.1. What is the purpose of the CoEGC?
- 4.2. To whom is this code intended?
- 4.3. How to know if you are making an ethical decision?
- 4.4. What is the Ethics Committee?
- 4.5. What are the consequences of a violation of this Code?
- 4.6. How to report a violation?
- 4.7. When does this code come into effect?

## 15 - 17

### 5. WHAT WE EXPECT FROM YOU

## 18 - 33

### 6. RULES OF CONDUCT OF THE AQUINOS GROUP

- 6.1. Human Rights
- 6.2. Child Labour
- 6.3. Corruption and Related Offenses
- 6.4. Gifts, Presents and Hospitality
- 6.5. Conflict of Interests
- 6.6. Fair Competition and Cartel

- 6.7. Protection of Physical, Financial and Intellectual Assets
- 6.8. Use of Company Information for Studies and Investigations
- 6.9. Personal Data Protection
- 6.10. Use of the Internet and Email
- 6.11. Interaction with the Press and Social Media
- 6.12. Occupational Health and Safety and the Use of Alcohol and Drugs
- 6.13. Social and Environmental Responsibility
- 6.14. Prevention and Combating of Harassment in the Workplace

## 35 – 36

### 7. FINAL PROVISIONS

## 37 – 38

- WE SHOULD NOT
- WE SHOULD



## **1. PURPOSE**

The Code of Ethics and Good Conduct (CoEGC) is a tool that sets out a set of rules, based on the Organization's values and principles in terms of ethics and professional conduct, which must be observed by all employees of the Companies of the Aquinos PT Group, namely: Aquinos, S.A.; Aquinos Industry, S.A.; Eurotábua, S.A.; Novaqui, S.A.; Clibed, Lda.; Gof foam, Lda.; Aquisave, Lda.; Nova Gilufa, Lda.; e Lya, Lda.; in the development of its activities and in professional relationships with each other and with third parties.

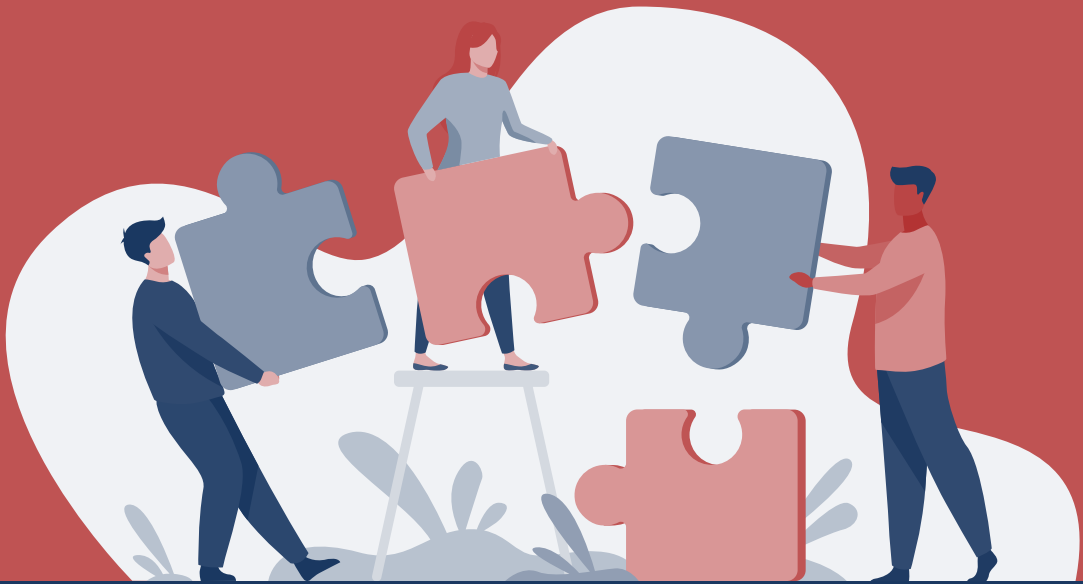
## 2. LEGAL BASIS

This Code of Ethics and Good Conduct is an integral part of the regulatory compliance program adopted and implemented by the Aquinos Group in line with Decree-Law No. 109-E/2021 (National Anti-Corruption Mechanism and General Regime for the Prevention of Corruption), supplemented by all applicable national and international laws and regulations. Among these regulations, we highlight Law No. 7/2009 (Labour Code), Law No. 93/2021 (General Regime for the Protection of Whistle-blowers), Law No. 19/2012 (Legal Regime of Competition), EU Regulation 2016/679 and Law No. 58/2019 (Processing and Circulation of Personal Data) and DL No.480/1999 (Code of Labour Procedure).

In addition to responding to legal requirements, the CoEGC promotes the dissemination of the Organization's norms and values, which is a complementary instrument to the other established documents, namely: the Individual and Collective Employment Contract, the General Internal Regulations, Internal Workplace Harassment Policy, the Internal Regulations for the Prevention and Control of Alcohol and Drug Consumption, the Internal Regulations for the Protection of Personal Data, the Internal Regulations for Customer Hospitality, the Internal Regulations for the Ethics Committee, the Internal Disciplinary Regulations and the Employee Manual, among others.

In view of the above, it is the responsibility of all employees in the exercise of their duties to comply with the rules in this Code and in other internal documents. Failure to comply with established rules may lead to disciplinary, civil or criminal sanctions, depending on the violation committed.

# 3. OUR VALUES



The Organization has five essential values that translate what is expected in the organizational context. These values serve as a guide for the behaviour, decisions, and interactions of employees with other people and the external environment. The Group's values are

**ETHICS** - is a set of permissions and prohibitions that have an enormous value in the lives of people and companies and should guide their behaviour;

**INTEGRITY** - is the honourable, lawful and respectful way in which Companies carry out their business in all interactions with customers, suppliers, employees and service providers;

**TEAM SPIRIT AND UNITY** - is the perception that it is not enough to have just a group of people, but rather a common goal in which all employees act together in order to achieve it;

**QUALITY** - is the search for excellence in the offer of products and services;

**INNOVATION** - is the continuous search for improvement or creation of new processes, products and services that promote competitive advantages and business sustainability.

# 4. INITIAL CONSIDERATIONS





## 4.1. WHAT IS THE PURPOSE OF CoEGC?

The general purpose of this Code is to establish, promote and strengthen the Organization's standards and values in terms of ethics and professional conduct. Thus, it has as specific objectives:

- Make known to all interested parties of the Organization the guidelines, rules and norms adopted in matters of ethics and professional behaviour;
- Reaffirm and propagate the values and principles adopted by the Aquinos Group;
- Strengthen decision-making, behavioural and ethical attitudes in the work environment and in business relationships;
- Contribute to the reinforcement of a responsible and ethical organizational culture;
- Strengthen the development of relationships based on trust and mutual respect.

## 4.2. TO WHOM IS THIS CODE INTENDED

This Code applies to all employees of the Companies referred to in point 1, regardless of their hierarchical position or their specific functions and responsibilities or contractual relationship, also applying to service providers and interns who carry out activities on the premises of the Companies.

All employees must therefore identified with this Code and commit to respecting its guidelines, with special emphasis on employees in leadership positions (directors or managers) who must set an example in complying with the Code and promote the monitoring of their teams in terms of ethics and professional conduct, clarify any doubts, and, if necessary, request additional training. To do so, they must have fully internalized the Company's ethical guidelines and encourage their use during the decision-making process.



### 4.3. HOW TO KNOW IF YOU ARE MAKING AN ETHICAL DECISION?

This Code does not cover all situations that may arise in the decision-making process. It is merely a guide to help understand more sensitive situations and indicate ways to choose and act ethically.

Therefore, when faced with the need to make a decision involving ethically sensitive situations, the employee should act with consideration and reason, ensuring that the measures taken are adequate, necessary, and proportionate to the objectives at hand. In case of doubt, the employee should self-question:



A positive answer to these questions demonstrates that the decision should not be adopted. Doubts that persist during this decision-making process must be clarified with the hierarchical superior or questioned through the Employee Portal, in the “HR Communications” field.

#### 4.4. WHAT IS THE ETHICS COMMITTEE?

The Ethics Committee is a multidisciplinary body whose objective is to be a reference in matters of ethics and professional conduct for the Organization and to ensure the monitoring and implementation of all applicable legal rules in this matter. In the exercise of its functions, it acts in an advisory manner for situations in which the decision-making or the situation experienced requires a more detailed and/or careful assessment, and in a decisive manner, whenever called upon to investigate and refer situations that violate this Code.

In this way, it is the responsibility of the Committee to ensure the adoption of internal measures suitable for verifying the received reports and, if necessary, ensuring the suspension of the violation and initiating disciplinary proceedings and/or reporting to the relevant authorities.

The Ethics Committee is made up of representatives from Management, COO, Operations Department, Human Resources, Compliance and Legal Assistance. In the event of a potential conflict of interest with any of the members of this committee, this member should not be part of the investigation in question, in accordance with the rules contained in the Internal Regulation of the Ethics Committee, which defines the functioning of this committee and its attributions and Limits.



## 4.5. WHAT ARE THE CONSEQUENCES OF A VIOLATION OF THIS CODE?

This Code constitutes an obligation for all employees in the exercise of their duties and in professional relationships with each other and with third parties, therefore, its non-compliance may result in disciplinary, civil, or criminal sanctions, applicable in accordance with the offense committed. In this way, all situations in which the employee presents unacceptable behaviour that violates the rules contained in this document, as well as the bad-faith reporting, are subject to disciplinary sanctions, which depending on their severity, may be referred to civil and/or criminal justice.

Among the disciplinary sanctions applicable for employees are reprimand, recorded reprimand, pecuniary sanction, loss of vacation days, suspension of work with loss of pay and seniority, and dismissal without indemnity or compensation, pursuant to article 328 of the Labour Code. The other workers (service providers, interns, etc.) may have the termination of contract as a sanction, and depending on the severity, be submitted to civil or criminal justice.

For an adequate application of the disciplinary sanctions provided for in the General Internal Regulations, the Organization reserves the right to initiate disciplinary proceedings, the rules of which are defined in the same Regulations, as well as in the Internal Regulations of Disciplinary Procedures, both in accordance with the Labour Code and the Collective Bargaining Agreement.

It should be noted that all employees involved in behaviour prohibited by this policy, as well as those who make bad-faith reports, will be subject to disciplinary action. Recurrence in abusive behaviour by an employee (targeting the same person or another) may result in the immediate initiation of disciplinary proceedings with a view to dismissal for gross misconduct, or the termination of contracts for the supply of goods or services. Any form of retaliation recorded during the investigation process greatly aggravates any sanctions. In particularly serious cases and/or when proof of an incident of sexual and/or moral harassment is verified, the Organization will provide full legal and technical support to the employee who has been the target of this abusive behaviour so they can resort to civil and/or criminal justice.



## 4.6. HOW TO REPORT A VIOLATION?

All reports of violations of this Code may be communicated to the hierarchical superior, when possible, and/or reported through one of the existing internal reporting channels:

- HR Department - Contact the human resources staff of the Company in person at the HR Department during the published hours and days;
- Phone Contact - Contact the human resources department, either identified or anonymously, by calling the number 235 710 223 during business days from 09:00 AM to 12:00 PM and from 02:00 PM to 06:00 PM.
- Reporting Channel - Access the Reporting Channel through the link provided on the Aquinos Group website, on the Employee Portal, or through the direct link: <https://aquinos.workky.com/portal-denuncias>.

For a proper investigation of whistleblowing situations, whenever possible, the following information should be provided:

- Personal identification (preferably, for the sake of accuracy in the investigation and to protect all parties involved);
- Company name and identification of the sector where the incident occurred;
- Description of all relevant information about the incident;
- Indication of the duration of the ongoing situation;
- How you became aware of the situation;
- Indication of the person(s) involved and/or the witness(es);
- Information about sharing the situation with other individuals, and if applicable, identifying who they are;
- Existence of supporting documentation.

In view of the received reports and in accordance with Law No. 93/2021, it is the responsibility of the Organization to:

- Ensure that the employee has a suitable and capable space for evaluating improper conduct;
- Ensure that the investigation and handling of all reported conduct occur in a thorough, objective, fair, and confidential manner;
- Ensure the confidentiality and protection of the whistleblower, provided that such reports are in good faith (without malicious intent or defamatory intentions to harm others);
- Ensure the receipt and follow-up of the report independently, impartially, and without any conflict of interest among those involved in the handling process;
- Report the facts to the appropriate authorities whenever necessary;
- Ensure communication to the whistleblower regarding the receipt of the report, its progress, and the conclusion of the investigation within the specified timeframe.

It is important to note that the whistleblower should only resort to external reporting channels or publicly disclose a violation when the necessary conditions for making an internal report are not guaranteed or when the situation falls within one of the cases referred to in Article 7 (paragraphs 2 and 3) of Law No. 93/2021.

#### **4.7. WHEN DOES THIS CODE COME INTO EFFECT?**

This Code comes into effect on the date of its publication on the intranet and internet (Aquinos Group website) and is valid indefinitely. However, it will be subject to review every 3 (three) years or whenever there is the implementation/change of legal regulations on the matter or that there is a change in the attributions or in the organic or corporate structure of the Aquinos Group that implies a review.




# 5. WHAT WE EXPECT FROM YOU





Ethics and appropriate professional behaviour should be incorporated into professional life. Consequently, the organization expects from its employees:

- Compliance with the highest standards of integrity, ethics, and legality, supported by the Constitution, applicable national and international laws, as well as the guidelines, norms, regulations, and procedures in effect;
- The establishment of internal and external relationships based on reputable and dignified behaviour, safeguarding the reputation of the company;
- The exercise of their duties in a responsible, competent, efficient, and diligent manner, protecting the assets and materials of the company in a prudent and rational manner, in accordance with the principle of good faith;
- The adoption of a conduct of impartiality and fairness towards external entities (public or private, national or foreign), demonstrating high standards of professionalism;
- The development of interpersonal relationships based on mutual respect, loyalty, courtesy, cooperation, honesty, clarity of communication and the joint pursuit of excellence in the intended result.



It also expects that the employee who holds a position of management or leadership:

- Promote a work environment that values, through words and actions, an ethical attitude and the highest level of transparency, integrity and honesty in everything that is done;
- Have in-depth knowledge of this Code, the guidelines, rules and internal norms that affect the activities under their responsibility;
- Comply with and ensure compliance with all the principles outlined, always focusing on human rights, ethics, transparency, social responsibility, respect for laws and regulations, for the environment, human dignity and individuality, workplace safety, hygiene and health at work, continuous improvement, professional development, and personal growth aimed at productivity, competitiveness, profitability, and sustainability of the business;
- Participate in and encourage your teams to participate in all trainings and activities related to the organization's internal policies and procedures;
- Seek, whenever necessary, support and guidance in resolving doubts and understanding the rules that must be complied with and enforced;
- Report any concerns about a potential or actual violation of the law, this Code or the internal policies established for the Group.

# 6. RULES OF CONDUCT OF THE AQUINOS GROUP



## 6. RULES OF CONDUCT OF THE AQUINOS GROUP

The norms presented in this document do not cover all situations that may occur in the daily life of the Companies. Therefore, any omitted situations should be questioned to superiors or, when necessary, through the Employee Portal, in the “HR Communications” field.

### 6.1. HUMAN RIGHTS

The Organization adopts the principles and values contained in national and international legislation on human and social rights, also committing to the Fundamental Conventions of the ILO (*International Labour Organizations*). In doing so, it seeks to promote equal opportunities, integrity, and dignity in its workplaces and in the actions carried out (recruitment, selection, and promotional activities), always with a focus on strengthening and maintaining a healthy, conciliatory work and cooperative work environment.

To achieve this, the Organization requires its employees to respect human rights and strongly prohibits any form of discrimination based on sex, gender, sexual orientation, race, ethnicity, religion, political affiliation, or any other discriminatory factor, as stipulated in the Labour Code (Article 23).

In situations where employee(s) are found to be engaging in practices that violate human rights, they will be subject to disciplinary action and accountability, in accordance with the disciplinary sanctions outlined in the relevant legislation, including termination for gross misconduct.

## 6.2. CHILD LABOUR

In our selection and recruitment processes, the Organization does not allow the hiring of children or young individuals below the legal working age. We only permit the hiring of young employees who are 16 years old or older, provided that they have completed the legally required minimum education or are attending an educational or training program that fulfils the compulsory schooling, a professional qualification, or both, duly verified and documented. Respecting all other rules stipulated in the Labour Code regarding working conditions, permitted schedules, and the assessment and communication of workplace risks, as per Articles 66, 69, 72, 73, 74, 75, 76, and 77.

Therefore, all employees are required to commit to reporting any knowledge of child labor within the facilities of Aquinos Group Companies Portugal, as well as among their business partners. Such situations will be investigated, and all necessary measures will be taken in accordance with applicable legislation.

## 6.3. CORRUPTION AND RELATED OFFENSES

The issue of corruption and related offenses is understood as any practice or omission of an act, which may occur legally or illegally, with the aim of receiving or having the promise of undue compensation, for oneself or for third parties. In the General Regime for the Prevention of Corruption (RGPC - Decree-Law nº 109E/2021) the crimes stipulated in the Penal Code are considered as corruption and related infractions: crimes of corruption, undue receipt and offer of advantage,

embezzlement, economic participation in business, concussion, abuse of power, malfeasance, influence peddling, money laundering or fraud in obtaining or diverting subsidies, grants, or credit.

Regarding money laundering and terrorist financing, the Organization complies with all requirements of the prevention laws and has procedures in place for this purpose. It engages in partnerships with its stakeholders exclusively for legitimate and legal business activities.

Consequently, the Organization does not tolerate corrupt practices and strictly prohibits its employees from using their hierarchical position, image, name, brand, or information, as well as the organization's working methods and business, for personal or third-party gain. Offering payments or advantages of any kind (bribes) to agents, consultants, intermediaries, public officials, or private company employees, etc., with the aim of ensuring that actions, activities, and decisions occur in a facilitated manner and in favor of the Company, is equally and absolutely prohibited.

Therefore, all instances of corruption and related offenses will be promptly investigated through the initiation of a disciplinary process, and upon confirmation of violations of current norms and rules, they will be referred to the appropriate authority so that they may determine the appropriate civil and/or criminal proceedings to be undertaken.



## **6.4. GIFTS, PRESENTS, AND HOSPITALITY**

The Organization does not encourage the practice of offering and/or receiving gifts, presents, and hospitality (such as travel expenses, accommodation, etc.). Such offering and/or receiving should only occur under specific and limited circumstances, such as product demonstrations, promotions, or explanations, and should always be limited to a reasonable value. It is emphasized that the offering and/or receiving should never aim for personal benefit or the intention of inappropriately influencing a public entity or business partner.

Hospitality towards clients is governed by the Internal Regulation on Hospitality towards Clients. In cases where the offering and/or receiving of gifts, presents, and hospitality exceed the limits defined in the regulation, disciplinary action may be taken, and such actions can be characterized as corruption practices. They will be referred to the appropriate authority to determine potential civil and/or criminal liability of the individuals involved.

## **6.5. CONFLICT OF INTERESTS**

Conflict of interests arises when the pursuit of personal gain or individual advantage interferes with the business of the Company. It can occur when an employee engages in or promotes activities that directly compete with the Company, or when an employee has the power to influence a decision-making process that directly or indirectly involves individuals with whom they have or had personal relationships, such as family or friends, or organizations with which they collaborate or have collaborated.

To avoid conflicts of interest, employees should **NOT** engage in the following activities during their employment:

- Initiate activities that compete with the activities carried out by the Company they work for;
- Participate in decisions involving family members, friends, or organizations with whom they also collaborate or have collaborated;
- Make use of resources, working hours, equipment, materials, or information of the Company to perform services or activities that hinder job performance or the interests of the Company, or violate any of its policies or procedures;
- Encourage a client, supplier, or any other contracting party to terminate an existing relationship or alter its terms in a manner detrimental to the Company;
- Encourage directors, executives, and employees to terminate their employment contrary to the legitimate interests of the Company.

In the event of a situation that could create conflict of interests, the employee must immediately communicate this fact to their immediate superior so that they can assess the situation. If there are any doubts about how to handle the situation, it should be reported through the Employee Portal (under the *HR Communication* section, *Create Record*, and select the option *Communication of Conflict of Interests*) for evaluation and confirmation of the situation.

Failure to report conflict of interests may result in disciplinary liability under the current legal and regulatory provisions applicable to this type of violation.



## 6.6. FAIR COMPETITION AND CARTEL

A cartel is a horizontal agreement between companies aimed at eliminating competition among them or compromising the competitiveness of a competitor, with the goal of increasing profits. In Portugal, cartel practices are considered potentially offensive to the legal order, as outlined in Article 9 of the CL (Competition Law No. 19/2012), where the cartels can involve agreements to fix prices or other transaction terms, limit or control production, distribution, technical development, investments, or market allocation.

Therefore, employees in management positions must promote fair competition and should not engage in any negotiations with competitors, customers, suppliers, or contractors that may involve, directly or indirectly, prices, customers, suppliers, marketing, or production issues with the prospect of forming a cartel.

It should also be considered that when seeking information about competitors, each employee has the obligation and commitment to use only legally accepted means and sources, while maintaining the highest standard of ethical conduct in gathering market intelligence, as well as in negotiating and conducting necessary business contracts.

The formation of a cartel is a very serious offense with consequences that can jeopardize the survival of the Company. Employees involved in such a violation will be subject to disciplinary proceedings and may be held accountable for their actions in both civil and criminal spheres.

## 6.7. PROTECTION OF PHYSICAL, FINANCIAL, AND INTELLECTUAL ASSETS

The physical, financial, and intellectual assets of the Group Companies are for exclusive professional use, and their use for personal or third-party benefit is strictly prohibited.

It is the responsibility of employees to ensure the protection and preservation of assets and the efficient use of available resources. This includes safeguarding the Company's resources against loss, theft, or misuse and adhering to safety regulations to prevent incidents that could jeopardize their health and the Company's assets.

Similarly, any privileged information related to plans, new products or processes, acquisitions and investments, financial results, negotiations, etc., must be treated as strictly confidential and should never be used to gain advantages or for personal interests.

The theft or misuse of resources or documents considered as the Company's assets constitutes a very serious disciplinary offense and may be grounds for immediate termination for gross misconduct. It is also subject to civil and criminal actions where compensation for the damages caused may be sought after by the company.



## 6.8. USE OF COMPANY INFORMATION FOR STUDIES AND INVESTIGATIONS

The participation of employees or interns in scientific or academic activities involving the disclosure or publication of internally produced non-public information, data, and/or documents requires prior authorization from the Company. The employee has the duty to properly identify the source of information and explicitly state that all observations and conclusions are of a personal nature and do not necessarily reflect the opinion of the Organization.

The request for authorization for study and research should be made through the Employee Portal (under the *HR Communication* section, *Create Record*, and select the option *Study and Research Authorization*). The improper use of information, data, and documents goes against this Code, which may result in the initiation of disciplinary proceedings and the application of the sanctions provided (see section 4.5) for the respective employee.

## 6.9. PERSONAL DATA PROTECTION

As part of their business operations, the Companies mentioned in point 1 may collect, process, record, use, store, transfer, and/or disclose personal information of their employees, customers, suppliers, and/or other business partners. However, all processed information must be protected in accordance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, confidentiality, and accountability, as stipulated in the Internal Data Protection Regulation, which is based on the EU Regulation 2016/679 and Law No. 58/2019 (Personal Data Protection). The subcontracted entities of the Group Companies are authorized in writing to carry out this processing and are governed by the same principles.

Given the assigned duties, it is the responsibility of employees (including subcontractors) who handle personal data to:

- Promote confidentiality in handling and processing information, protecting against unauthorized access and improper disclosure;
- Use information solely for the intended purposes;
- Promptly report any incidents of data breaches to the immediate supervisor;
- Maintain the confidentiality of information, even after the end of the employment relationship.

Violations or failure to report such incidents constitute a very serious disciplinary offense and may be grounds for immediate termination for gross misconduct. Additionally, civil and criminal actions may be taken, where compensation for the damages caused may be sought after by the company.

## **6.10. USE OF THE INTERNET AND E-MAIL**

Access to the Internet, Wi-Fi, email, and other electronic systems provided by the Company are for professional use and communication. Therefore, the use of these electronic systems to transmit, receive, or download content that hinders job performance or conflicts with the interests of the Company is not permitted. Accessing and sharing content related to pornography, terrorism, drugs, or other inappropriate content, as well as the exchange of files, documents, videos, and audio that do not serve the interests of the Company, are prohibited and may, depending on the case, result in disciplinary, civil, or criminal sanctions.

The computers and servers, including sent and received emails, are the property of the Company. However, in compliance with applicable legislation, the Company will not access the information contained on the computers of each employee during or after the employment relationship without the consent of the respective user.

Additional information regarding the use of the internet and email can be found in the General Internal Regulations.

## **6.11. INTERACTION WITH THE PRESS AND SOCIAL MEDIA**

Employees should not independently contact the press regarding matters concerning the Companies. Issues relevant to the Companies are the responsibility of the Management, Group Operational Management, and respective General Management.

Regarding social media, employees of the Companies should maintain conduct that does not demonstrate conflict of interests and that could result in undue favors, benefits, or advantages for themselves or third parties.

To ensure the proper use of these social media platforms, the Organization establishes some guidelines on what is not permitted for employees, including:

- Creating institutional profiles related to the Company without authorization;
- Creating profiles using names that reference the Company without authorization;
- Using the Company's logo in group, personal, or professional profiles;

- Speaking on behalf of the Company, unless officially authorized;
- Represent the Company without authorization from management;
- Disclose private or confidential information of the Company and/or its employees;
- Take photographs and/or record videos in the workplace, exposing the Company's premises and/or employees;
- Disclose information that could harm business strategies and communication;
- Engage in disrespectful criticism of the Company, employees, partners, suppliers, and competitors;
- Quote partners, suppliers, or clients without proper authorization.

All relevant criticisms regarding the Company should be reported to management and leadership for analysis and appropriate response, as well as contribute to internal improvement of working relationships and business processes.

Regarding whistleblowing, employees should always use the existing reporting channels within the Organization and should not publicly disclose such reports, except in situations covered by Article 7(3) of Law No. 93/2021.

Violation of the content of this policy may result in the initiation of a disciplinary process and the application of the specified sanctions (see section 4.5).

## 6.12. OCCUPATIONAL HEALTH AND SAFETY AND THE USE OF ALCOHOL AND DRUGS

Health and safety at work are related to the prevention of accidents and occupational diseases, as well as the protection and promotion of the health of all employees. For the Organization, the objective is to improve the conditions and the work environment by promoting and maintaining a healthy and safe workplace, through compliance with safety rules and applicable regulations regarding safety, health, hygiene, and well-being in the workplace, in accordance with what is described in the General Internal Regulations.

In order to promote a healthy and safe work environment, it is expected that all employees maintain a workplace free from alcohol and drugs. It is the responsibility of every individual to work without being under the harmful effects of narcotic substances, ensuring their ability to perform tasks without compromising the quality of service provided, their own safety, and the safety of their co-workers.

In accordance with legal requirements, the Group Companies may conduct alcohol and drug consumption control tests, following the criteria outlined in the Internal Regulation for the Prevention and Control of Alcohol and Drug Use. Throughout this control process, full confidentiality, discretion, privacy, and seriousness are ensured as required by the situation. However, refusal to undergo the test is considered a very serious disciplinary offense and may result in termination for gross misconduct.



## 6.13. SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

Within the scope of Social and Environmental Responsibility, the Organization commits to ethical citizenship and continuous improvement of the services provided. We are dedicated to making a positive contribution to society, preserving the environment, and promoting socially just and responsible policies. Our actions ensure both our economic and financial performance and enhance the quality of life for our workforce, their families, the local community, and society.

At the environmental level, we promote awareness by disseminating good environmental practices and implementing strategies and tools to minimize the impacts resulting from our business activities. We prioritize efficient waste management and prevention, control of air emissions, and, whenever possible, waste reuse. These efforts contribute to reducing adverse effects on the community, natural resources, and the environment.

In this regard, it is the responsibility of the Companies, with the support of their employees, to:

- Adopt and ensure the implementation of organizational practices integrated with environmental protection;
- Utilize sustainable environmental development tools to minimize the environmental impacts arising from our activities;
- Adopt strategies that aim for efficiency in our production processes, optimizing the use of raw materials (reducing waste) and maximizing quality and desired outcomes;
- Raise awareness, promote, and disseminate good environmental practices.



Instances where intentional actions by an employee(s) result in harm to the environment and the community should be reported to enable the initiation of a disciplinary process and accountability for their actions. Disciplinary sanctions outlined in section 4.5 may be applied as deemed appropriate.

#### **6.14. PREVENTION AND COMBATING OF HARASSMENT IN THE WORKPLACE**

Bullying is a set of unwanted behaviours perceived as abusive, practiced persistently and repeatedly, which may consist of a verbal attack with offensive or humiliating content or subtle acts, which may include psychological or physical violence. It aims to lower the self-esteem of the targeted person(s) and, ultimately, call into question their connection to the workplace. Victims are involved in situations in which they generally find it difficult to defend themselves.

Sexual harassment is a collection of unwanted behaviours perceived as physically, verbally, or non-verbally abusive. It may include disturbing physical contact attempts, requests for sexual favors with the objective or effect of obtaining advantages, blackmail, and even the use of force or coercive tactics to manipulate the will of another person. These behaviours are typically persistent and can be explicit and threatening, although they may also occur as isolated incidents.





The Organization does not tolerate the existence of moral and/or sexual harassment at work and adopts a zero-tolerance policy. Therefore, it is the responsibility of all employees to prevent and refrain from engaging in any form of harassment, including verbal or physical humiliation, coercion, or threats. Employees who experience harassment should report it through the available internal communication channels (refer to section 4.6)

In accordance with the provisions of the Internal Regulation on Workplace Harassment, the Company will initiate a disciplinary process for all cases of moral and/or sexual harassment. Depending on the severity of the incident and the availability of evidence, the Company will provide legal and technical support to the employee who has been subjected to harassment, enabling them to pursue civil and/or criminal action if necessary.



**CODE  
OF ETHICS**

# 7. FINAL PROVISIONS

## 7. FINAL PROVISIONS

As previously mentioned, this Code has the general objective of establishing, promoting, and strengthening the Organization's standards and values in terms of ethics and professional conduct. Being a supplementary document, it does not replace the other documents created, therefore, whenever necessary, the existing regulations in the Company must be consulted to clarify any doubts and/or deepen the understanding of the subject in question.

In a similar way to other regulations established in the Aquinos Group, this Code will be subject to internal audits to assess its compliance.



# WE SHOULD NOT

- Participate in illegal practices;
- Discriminate against colleagues based on race, religion or other individual aspects;
- Leave exposed important documents containing personal or confidential data;
- Provide third parties with logins and passwords;
- Disturb the work productivity of co-workers who share the work space;
- Damage and not maintain the work material;
- Provide third parties with information entrusted to us on processes of a sensitive or reserved nature;
- Use privileged information for personal or third party gain;
- Take or use Company resources for personal purposes;
- Accept to participate in supplier selection processes, which may create situations of conflict of interest;
- Publish on social media confidential information about the company and its employees.

# WE SHOULD

- Act with honesty and demonstrate diligence and responsibility in the performance of our duties;
- Promote a respectful and safe environment in the workplace, free from discrimination and harassment of any kind;
- Ensure the preservation of assets and the proper use of resources in the performance of our duties;
- Know your own limits, promoting self-responsibility for the quality of the work and the acknowledgment of mistakes made, correcting them and avoiding them in the future;
- Take a constructive approach to internal problems, being open to criticism and different perspectives;
- Comply with applicable laws, internal and external regulations, as well as legal and regulatory requirements;
- Report any behaviour that conflicts with this Code of Ethics and Good Conduct.

