

# **CODE OF ETHICS AND CONDUCT**

**TECHNOEDIF ENGENHARIA, S.A.**



## Message from the Chairman of the Board of Directors

Technoedif Engenharia, SA, founded in 1965, has established a set of fundamental values and principles over the decades of its history, without which it would not have been possible to achieve success nowadays.

Technoedif Engenharia, SA, within the scope of its activity and throughout its journey, has always obeyed and transmitted and will continue to do so, the highest values of transparency and integrity to everyone who interacts with it, whether workers, suppliers or clients who, recognizing these values, have become loyal by providing engineering services of the highest quality and excellence.

Ethics has been, throughout its existence, one of the guiding threads that has brought us to the present and will take us into the future.

Our biggest project is to continue progressing on the path to success, always accompanied by the values that we consider fundamental, continually improving the organization and increasingly perfecting these values, with the commitment that we will do everything in our power to ensure that their goals and purposes are always achieved in a clear and transparent manner.

Fernando Carvalho  
Chairman of the Board of Directors

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## CODE OF ETHICS AND CONDUCT

This Code of Ethics and Conduct is adopted by Technoedif Engenharia, SA and includes, in accordance with Decree-Law 109-E/2021, which establishes the General Corruption Prevention Regime, a set of principles, values and rules of action for all employees in terms of professional ethics.

### 1. OBJECTIVES AND VALUES

In developing its activity, Technoedif Engenharia, SA (“TEE”) aims to achieve the following fundamental objectives:

- a) The satisfaction of its clients, by providing engineering services in accordance with the contractual commitments made. As a result of the provision of engineering services carried out with a high level of quality, adding value and implementing effective solutions to satisfy the needs of its Clients, at competitive costs. TEE aims to obtain high professional consideration from its Clients and, as far as possible, their loyalty.
- b) Fair remuneration for the provision of its engineering services, carried out effectively and efficiently, necessary for the development of the company, always in compliance with contractual commitments, laws and standards of professional ethics.
- c) The well-being and appreciation of its workers by ensuring a good working environment, equal opportunities, fair remuneration and benefits and a balance between professional and personal life.
- d) Sustainability in the provision of engineering services, considering business continuity and the impact on people and the community in which it operates, as well as the communities in which the purpose of its services is implemented.

In developing its activity, TEE is governed by the set of values identified below and which characterize the integral way in which it approaches business and respect for all stakeholders:

- To seek to anticipate the needs and expectations of our clients and provide products and services that offer them maximum value, in terms of price, quality, deadlines, safety and compliance with environmental protection requirements;
- To provide opportunities for success to all our partners, suppliers and contractors, in a spirit of healthy competition and mutually fruitful collaboration;

- To conduct the Company's business, in strict compliance with the highest standards of honesty, integrity and equity;
- To place the men and women who make up its human resources at the heart of the Company's development strategy, providing them with the best conditions for their well-being, safety and health, as well as for the full development of their individual potential and balance between professional and personal life;
- To share, in a timely manner and in a transparent and frank manner, information with our shareholders, ensuring the relevance of the data provided to them.

## 2. RECIPIENTS

This Code applies to all Directors, Workers and other collaborators who act on behalf of the company towards third parties.

## 3. FAILURE TO COMPLY WITH THE CODE OF ETHICS AND CONDUCT

Failure to comply with this Code of Ethics and Conduct is a serious violation of ethical duties, responsibility and transparency. It is subject to the application of disciplinary sanctions, in accordance with labor legislation, or the investigation of possible criminal liability, applicable to all those involved, namely Management, Workers and other Collaborators.

If the object of non-compliance is an act of corruption or a related infraction, it will be subject to criminal sanctions, in accordance with applicable legislation.

## 4. INTEGRITY COMMITMENT

Throughout its history, one of TEE's main values has been the pursuit for excellence in the provision of Engineering services with ethics and transparency, which has been one of the pillars supporting the company's growth, which is why the Management, Workers and all the other collaborators are committed to comply with this code, TEE's internal rules and, mainly, the legislation and regulations in force, valuing their applicability and efficiency.

## 5. CONFIDENTIALITY

TEE's activity consists of providing a wide range of engineering services, related to satisfying the requirements of projects to be implemented by its Clients. These projects have, as one of the main requirements, confidential aspects, the violation of which implies a serious contractual breach, which could result in heavy compensation for TEE, and could, at the limit, endanger the continuity of the company. Therefore, all Directors, Workers and Collaborators are obliged to strictly comply with it.

## 6. DATA PROTECTION

Any and all internal information is subject to compliance with the General Regulation for the Protection of Personal Data (GRPPD), and may not, under any circumstances, be disclosed, shared or reported externally without the express consent of TEE. This protection extends to the personal data of all employees.

## 7. CONFLICT OF INTEREST

A conflict of interest occurs whenever there is some personal benefit in conflict with ethics or the interests of the company. To avoid such situations, it is prohibited:

- Receiving or giving advantages and gifts to Clients and Official Entities or similar entities
- Receive advantages and gifts from Suppliers in exchange for favors;
- Acquire products or services under privileged conditions from Suppliers, in violation of internal rules;
- Favoring third parties with the aim of receiving personal advantages;
- Carry out any professional activity that conflicts with TEE's interests or with the fulfillment of its obligations.

## 8. RULES OF CONDUCT– DIRECTORS, WORKERS AND COLLABORATORS

The internal relationship between all employees, including Directors and Workers, must value total courtesy and respect, regardless of the existing hierarchy.

Every employee carries the company's image with him, and conduct that violates ethics, morals and the laws in force, both in the workplace and outside it, will not be tolerated.

The following are not permitted under any circumstances:

- Conduct that privileges or discriminates against any employee based on social class, color, gender, sexual orientation, nationality, race, age, religion, marital status or physical condition;
- Conduct that causes any intimate or public embarrassment;
- Conduct that disrespects any internal rules or legislation in force;
- Conduct that puts any employee at risk;
- Conduct that disrespects the interests of the company.

## 9. RULES OF CONDUCT – CLIENTS

All work produced and developed by the company is based on maximum client satisfaction. To this end, any and all relationships with clients must respect:

- Transparency in the relationship, providing the necessary information to the client;
- Prioritize client satisfaction, observing TEE's internal standards;
- Providing engineering services with a high level of quality, adding value and implementing effective solutions to meet client needs;
- Ensure that clients' personal data is not transmitted without their consent;
- Protecting the confidentiality of business, patents, tests, documentation, so as not to harm the direct or indirect interests of clients.

## 10. RULES OF CONDUCT – SUPPLIERS

All relationships with suppliers must be conducted in accordance with the internal procedures for requesting proposals, selection, evaluation and choice, based on objective, technical and professional criteria, set out in the Quality Manual and the Supplier Code of Conduct.

The relationship with suppliers must always respect:

- Strict compliance, by suppliers, with this Code of Ethics and Conduct and other TEE internal rules;
- Strict compliance, by suppliers, with legislation on preventing and combating corruption.

## 11. RULES OF CONDUCT – COMPETITOR COMPANIES

All conduct and decisions to be made must prioritize the client and must be based on ethics and transparency. In this sense, any conduct that characterizes unfair and anti-competitive competition will not be tolerated, such as:

- Restrict competition through agreement, with the intention of increasing or fixing prices;
- Use of privileged information;
- Determine a winner through agreement between companies.

## 12. MONITORING THE CODE OF ETHICS AND CONDUCT

This Code of Ethics and Conduct is available on TEE's intranet and on the company's official website.

Whenever there is any conduct that violates or puts at risk compliance with this Code of Ethics and Conduct, any employee and third parties will have access to the Company's Reporting Channel, accessible through the following email address: <https://www.technoedif.com/en/complaints-portal/>

TEE guarantees the confidentiality of reports, the protection of whistleblowers' data and the absence of any type of retaliation.

## 13. GENERAL CONDITIONS

This Code of Ethics and Conduct comes into force as soon as it is published, with no expiration date, and must be reviewed at least every three years or whenever changes occur in the duties or in the organic or corporate structure that justifies its revision.

Porto Salvo, May 22, 2024.  
Technoedif Engenharia, S.A.