
**SUPPLIER
CODE OF
CONDUCT**

casais.pt

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Objective

At the Casais Group, we assume the strong commitment of conducting our business in an ethical and legal way, expecting the companies we associate with to do the same. With this code of conduct, we aim to contribute to the construction of a better and more sustainable world. In this way, we seek to select suppliers and subcontractors who share our principles of integrity, humanism, rigour, cooperation, honesty, transparency and environmental and social responsibility.

Compliance with laws, regulations, statutory provisions, as well as behaviours based on integrity, ethics, transparency and honesty are commitments shared by all that must characterise the actions of organisations before the communities they are located in. Thus, all corporate activities of the CASAIS Group are always carried out within a framework of transparency, professionalism, rigour and with full respect for the rules of competition. Our partner's duty is to respect all legal practices instituted by public and private entities with whom they relate or are obliged to render accounts to and other responsibilities arising from the activities they develop.

We understand that while our suppliers, subcontractors and their representatives (the term 'Representatives' includes directors, officers, partners, managers, members, employees, consultants, agents and other representatives of a party, including, without limitation, attorneys, accountants, auditors and consultants) are independent entities, their business practices and actions may affect our reputation. This Code of Conduct intends to establish rules of action so our suppliers, subcontractors and their representatives, apart from any specific contractual obligations, adopt them in their interactions with their surroundings. We expect all our suppliers, subcontractors and their representatives to adopt and comply with this code and any updates thereto.

To build a more sustainable future with a more balanced society and a better environment, we will preferably build partnership relationships with suppliers and subcontractors who share our vision of the three fundamental pillars for building a more sustainable procurement: Environmental Commitment, Social Awareness and Economic Responsibility.



Environmental Commitment

Our suppliers, subcontractors and their representatives must have the general duty:

— **Carry out an active management in promoting biodiversity**

To show a clear understanding of their responsibilities, impacts and risks on the biodiversity of their products and services. They must have an effective environmental policy, statement or programme to mitigate impacts on biodiversity, the implementation of which must be evident at all levels of the company. It should strive to make continuous improvements in environmental performance through actionable measures and implement practices that promote biodiversity wherever possible.

— **Establish commitments to reduce pollutant emissions**

To comply with all applicable legal norms, regulations, standards, ordinances, rules, authorisations, licence approvals and orders regarding the environment and the use of restricted substances. They must obtain and keep up to date all required environmental permits, licenses, registrations and approvals, as well as any operational reports as identified in laws, regulations, standards, ordinances, etc. of the country they are located in.

— **Establish commitment to waste reduction**

To comply with all applicable environmental laws and regulations regarding waste, hazardous or toxic materials, identify and inform us of all constant chemicals in the products that are regulated by governments and other authorities in the applicable countries/regions where they are to be located and/or produced. They should make practical efforts to minimise the use of energy, water and raw materials. Where possible, these should be renewable or come from a sustainable origin. They should make practical efforts to eliminate or reduce the levels of waste generated and should reuse and recycle waste whenever possible. The handling, storage, movement, treatment and disposal of all waste must be carried out in accordance with applicable regulations and in an environmentally responsible manner.

Our suppliers, subcontractors and their representatives must act with respect for the environment and conduct their activities in such a way that they have the least impact on it. Where the impact on the environment is unavoidable, this impact should trigger concrete and compensatory measures.



Social Awareness

Our suppliers, subcontractors and their representatives must respect human rights and equal opportunities in the workplace and offer equal opportunities without discrimination of any kind. They should also make efforts to ensure that minorities are representative in all roles within their organisation in an equal opportunity system. Suppliers and subcontractors are also required to comply with the requirements of any applicable non-discrimination legislation.

Our suppliers, subcontractors and their representatives also have the duty to:

— **Not Discriminate**

Not discriminate against its employees and agents with whom they have a relationship with, all of whom must be treated equally. To ensure that they can freely report any practice of harassment or discrimination due to: gender, gender identity or expression, marital status, race, ethnicity or nationality, disability, religion, sexual orientation, age or social status.

— **Not use Child Labour**

To ensure that they and those with whom they have contractual relationships with do not use child labour and comply with all applicable child labour laws. They must also comply with local laws on the minimum age to work and not engage in any type of use of child labour, directly or indirectly. They must also govern their policy in accordance with the minimum age convention of the International Labour Organization (C138) of 1973.

— **Not use forced labour, involuntary and human trafficking**

Not support, promote or use compulsory labour, slavery, forced or involuntary labour or human trafficking of any kind. Not engage in physical 'discipline', abuse, threats or other forms of physical coercion or harassment.

— **Comply with immigration laws and proper documentation**

To employ or use only workers who have the legal right to work in the jurisdiction in which they intend to hire such employees. They should review the appropriate and relevant documentation and ensure the legal status of potential employees before hiring them.

— **Legally comply with wages and benefits**

To comply with all applicable laws and regulations regarding wages and working hours, including those relating to minimum wages, overtime, fees per piece and to ensure the legally required benefits.

— **Comply with work schedules**

Do not exceed the maximum working hours prescribed by law and ensure that overtime is paid in accordance with local laws and regulations. Working hours must be limited in accordance with national or local legislation, including breaks. Overtime should be voluntary, it should not replace regular employment and should be compensated fairly.

— **Ensure freedom of association**

Ensure that employees have the right to join unions or assemble without facing discrimination or intimidation. Where freedom of association and collective bargaining are restricted by law, employees should have the right to develop parallel means of association.



— Promote a good working environment

Provide a safe and healthy work environment and comply with all applicable health and safety laws and, where appropriate, establish plans to prevent injuries and occupational diseases and plans for emergency preparedness and occupational safety.

— Ensure the safety of the facilities

Always maintain adequate security on your premises. In addition, they must comply with our safety procedures when on our premises.

The Casais Group expects its suppliers and subcontractors to show the highest respect for ethical rules, adopting the highest internationally accepted standards of ethical behaviour. All types of: corruption, extortion, bribery and embezzlement are strictly prohibited and may result in immediate termination and legal action being taken.

Suppliers, subcontractors and their representatives do not offer money or other goods to any person if circumstances indicate that it is likely that all or part of the money or property is intended to influence the official action of an individual or entity or to obtain a commercial advantage. They must comply with all applicable trade control laws and regulations in the import, export, reexport or transfer of goods and services (including software and technology). They must not share or exchange information about prices, costs or other business information or engage in any colluding conduct with third parties. In addition, all types of abuse, threats, harassment, or intimidation should be strictly prohibited. They also have the duty to make available to all workers and external entities involved in their operations and supply chains a mechanism so that complaints related to work practices can be raised anonymously, without fear of retaliation. It should also effectively investigate them and take appropriate measures to remedy all claims and complaints raised.



Economic Responsibility

Our suppliers, subcontractors and their representatives must conduct their interactions and business activities ethically and legally without any limitation. For us, building a more sustainable world is only possible with economically stable partners who follow the highest standards of economic management. Thus, our partners must follow their economic objectives in accordance with the highest ethical principles and have an attitude of respect towards all their direct and indirect partners.

Our suppliers, subcontractors and their representatives must:

— Practice fair competition

Compete for all business opportunities fairly, ethically and in a legally compliant way with all antitrust and fair competition laws that regulate competition and trade in each country where they conduct their business. They must not engage in illegal bidding, price fixing, price discrimination, or other unfair business practices that violate antitrust laws.

— Establish a fair treatment policy

Deal fairly with customers, suppliers, competitors, independent auditors, employees and any regulatory authorities or governmental authorities and not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing or unfair practice.

— Refrain from making improper payments

Refrain from making any kind of improper payments to employees, customers, persons or government or non-governmental entities, nor request or accept any undue payment from suppliers, customers or anyone who intends to do businesses with them. They must ensure that they and their representatives do not offer, promise, provide, solicit or accept, directly or indirectly, bribes of any kind. Whether dealing with civil servants or government officials, other private sector entities or even individual individuals. They must ensure that they comply with, and cause their representatives to comply with, the anti-corruption laws, the money laundering and money laundering laws of the countries in which they do businesses in and any other applicable prohibitions regarding any type of bribery, undue discount or corrupt practices.

— Establish a policy for gifts and invitations

Use the principle of prudence and proportionality with regard to gifts and invitations. By no means it is incorrect to receive genuine gifts or invitations, however these should be reasonable. By no means may offers condition decisions and/or create a conflict of interest. Accordingly, gifts and invitations that are intended to obtain or retain a benefit or advantage that may influence our employees, compromise their judgement or oblige them in any way are not considered reasonable gifts.

Likewise, we do not want our suppliers or subcontractors to be influenced or pressured into accepting inappropriate gifts or invitations.



— Report and mediate conflicts of interest

Avoid the apparent or actual conflict of interest with respect to themselves and their representatives. They should not negotiate directly with any of our employees whose spouse, family member or relative has a significant financial interest in the supplier or subcontractor.

— Accuracy and clarity in marketing and sales

Accurately represent their products and services and comply with applicable legal and regulatory requirements governing the marketing and sales of their products and services.

— Comply with the law

Comply with all applicable local, national and commercial laws, statutes, acts, ordinances, rules, codes, standards, guidelines and regulations of the jurisdictions where they do businesses in, as well as the highest standards in their sector.

Other terms of conduct

Suppliers, subcontractors and their representatives must record and report all information accurately and honestly. No representative will sign, send or allow others to sign or submit on our behalf or in representation of the supplier or of the subcontractor any document or statement they know or have reason to believe to be false. All records and reports must be created, retained and disposed of in accordance with applicable legal and regulatory requirements.

Suppliers, subcontractors and their representatives are not authorised to speak on our behalf or publicly disclose our name, logo, products, parts, designs, relationships or any other non-public information without our prior written permission.

The purchase or sale of securities and/or shares, own or from another company, is entirely prohibited when in possession of information about us or another company, information that is not available to the general public and that may influence the decision of another investor to buy or sell such securities and/or shares.

Suppliers, subcontractors and their representatives must protect our intellectual property, shared data and information systems and must, without limitation:

— Respect intellectual property

Respect our intellectual property rights and third-party rights, respect all patents, trademarks and copyrights and comply with the requirements and terms of use.

— Respect confidentiality

Refrain completely from disclosing and using for their own or third-party purposes (without our express consent) our business data, confidential and intellectual property information, knowledge, projects, data, know-how or any other information considered 'confidential' by us. Without prejudice to other that may arise, this code considers 'Confidential Information' as any and all information, in any form or medium, written or oral, relating to financial statements, projections, prices and margins, assessments, strategic plans, programmes and policies, customers, suppliers, potential customers, facilities, equipment and other assets, products, product formulations, processes, manufacturing, designs, models, technical data, marketing, research and developments, trade secrets, know-how, patent applications not yet



published and technology. All notes, analyses, studies, interpretations, memoranda and other documents or reports in any form or medium are also considered confidential information. Our suppliers and subcontractors cannot share with us confidential third-party information without their prior consent. This code of conduct does not revoke any non-disclosure agreement, confidentiality agreement or any other established unless both parties agree to it.

— Manage private data

Process all personal information fairly and in accordance with all data protection and privacy laws applicable to that personal information. They shall take appropriate technical and organisational measures to protect personal information and prevent any unauthorised access, change or loss.

— Manage information systems security

Comply with our password maintenance, confidentiality and security requirements and procedures as a condition for providing us with products or services or for being given access to our internal systems, networks and facilities. The technology provided by us must be used only for authorised business purposes. You must not intentionally download, view or send materials of a discriminatory, threatening, sexual, pornographic, racist, sexist, defamatory or otherwise offensive nature.

They must also have a management system designed to ensure compliance with this code and applicable laws and regulations to identify and mitigate operational risks and facilitate continuous improvement in compliance with local and national laws and regulations. They must also provide a grievance mechanism, free from threats and reprisals, intimidations or harassment for any stakeholder able to report complaints and violations of this code, having a duty to investigate all complaints and take corrective action if necessary.

Our suppliers and subcontractors are responsible for ensuring that their representatives, suppliers and subcontractors understand and comply with this code and it is our expectation that they monitor the compliance of their actions with it. We will maintain a proactive stance in monitoring, auditing, and supporting its implementation.

With the implementation of this code of conduct, we have determined that (in addition to any other right contained in any contract entered into by us) if, at any time, one of our suppliers, subcontractors or their representatives does not comply with the standards set forth herein, we will have the right to cease any commitment thereto without prior notice and without any liability or obligation of any kind being attributable to us.

Any violation of this Code must be promptly reported and denounced through the email etica@casais.pt by any employee, shareholder, customer, supplier or subcontractor of the CASAIS Group or by any other interested party.



Acknowledgement of the supplier code of conduct:

We confirm that we understand and comply with the requirements set out in this Code of Conduct and it is our wish to adhere to the good ethical practices set out herein.

We agree to provide all information requested under this code and understand that we may be asked to accept additional inspections, visits or complete audits to assess compliance with the standards set out herein.

(Supplier/Agent Company Name)

(Supplier/Signatory Agent Name)

(Supplier/Signatory Agent Role)

(Signature)

(Supplier/Agent Company Address)

(Date: dd / mm / yy)