

# Code of Ethics and Conduct

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# Application scope

Saphety's Code of Ethics and Conduct is the document that integrates a set of principles that govern its activity and a set of rules of an ethical and deontological nature to be observed by all the shareholders and employees, in their relationship with customers, suppliers and remaining stakeholders.

It is also intended for third parties, contracted by, or acting on behalf of Saphety, in situations where Saphety can be held responsible by their actions.

# Vision, mission and values

## Corporate object

Services provision, training and consultancy in communication, processing, security and electronic data certification, electronic identification, storage and availability of databases and electronic payments; development, representation and sale of equipment and software products related to those services.

## Vision

To lead the market of services provision that allow the dematerialization, simplification and automation of the business processes between organizations in a secure, reliable, efficient, economical way and in accordance with the applicable legal framework, generating value for shareholders, customers, partners, employees and remaining stakeholders and contributing, namely, for the rationalization of the resources consumption.

## **Mission**

To help our customers to continuously improve their business processes, providing them technological solutions of excellence that guarantee the highest levels of effectiveness, efficiency, innovation and sustainability.

## **Values**

We undertake the responsibility of protecting the legitimate interests of the customers, bearing in mind that our services deal with goods and activities of great value to them.

Our positioning is ethical and equidistant before all stakeholders, in order to create a favorable environment to ensure our customer's confidence in our services, expertise and image.

We innovate as a mean to obtain competitive advantages. We seek to create favorable working conditions for the development of our employees, fostering transparency, honesty and result-oriented goals.

## **General principles**

The standards contained in this Code must be accepted, understood and practiced by all the employees, regardless of where they perform their activities, their hierarchical position or their specific roles and responsibilities.

### **Personal development and professional development**

Saphety considers the professional and personal development of its employees to be extremely important, promoting their continuous training as an element that enables their best performance and motivation. The adopted policies of selection, remuneration and professional progression are guided by merit and market reference practices criteria.

## **Protection of rights**

Saphety follows the principles and values contained in the national and international legislation on Human and Social Rights. Discriminatory behaviors based on gender, race, ethnicity, religious belief, party affiliation or other are not allowed and equal opportunities, ensuring integrity and dignity in the workplace are promoted.

## **Privacy and personal data protection**

The privacy and personal data protection constitute a fundamental commitment of Saphety to its employees, whose personal data will be processed by Saphety. Therefore, Saphety also aims to be completely clear regarding the purposes, rules for the exercise of the respective rights by the data subjects, and processing that it is done in relation to the personal data of its employees, not only seeking to comply with the applicable personal data protection legislation, as well as under Saphety's commitment to transparency and information regarding the reading of the Employees Privacy Policy.

Saphety advises and invites all its employees to read the Employees Privacy Policy and to review any other documents that Saphety may provide under this scope, which will be disclosed by the different means of communication between Saphety and its employees.

In accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27th, 2016, on the protection of individuals regarding the processing of personal data and the free movement of such data and that repeals Directive 95/46/CE (hereinafter "GDPR").

## **Bribery or corruption**

Any act that offers or accepts compensation or benefits that influence the behavior of others in order to obtain advantages for themselves or the company are condemned.

## **Hygiene and safety**

Saphety provides a healthy, safe and pleasant work environment that promotes the well-being and productivity of its employees.

## **Participation**

Saphety stimulates and encourages its employees to participate in effective communication, consultation and sharing processes and to seek personal and professional development in line with the company's mission and values.

## **Value creation**

All businesses aim to create long-term value, respecting the principles of sustainability and social and environmental responsibility.

## **Harassment at work**

Sexual harassment and moral harassment in the workplace, as ways of attacking people's dignity, can't be separated from more general forms of unequal access to resources, powers and prestige. On the one hand, the job world is not immune to a gender order and a gender ideology that reproduces inequalities between men and women.

At a national level, the concern with harassment prevention (moral and sexual) at the workplace is materialized through Law No. 73/2017, of August 16th, which reinforces the legislative framework for the prevention of harassment at the workplace through the amendment to the Labor Code, approved in annex to Law No. 7/2009, of February 12th, to the sixth amendment to the General Labor Law in Public Functions, approved in annex to Law No. 35/2014, of June 20th,

and to the fifth amendment to the Labor Procedure Code, approved by Decree-Law No. 480/99, of November 9th.

This legislative amendment is, on the one hand, framed by the objectives 5 and 8 of the 2030 Agenda, regarding the promotion of Gender Equality and Decent Work and Economic Growth, respectively.

Saphety undertakes, in line with its values, the duty of adopting a code of good conduct in matters of prevention and reaction to harassment at the workplace. Thus, Saphety elaborated the Code of Good Conduct for the prevention and response to harassment at the workplace, available at confluence: <https://alm.saphety.com/confluence/pages/viewpage.action?pageId=49907777>.

## Employees

### Training duty

Employees undertake their commitment of updating their skills and competencies, attending the training opportunities provided to them and recommended by the company.

### Innovation and initiative

In order to achieve the collective goals, each employee, individually, must adopt a committed and proactive attitude, implementing innovative solutions that surpass the value created by the application of traditional solutions.

### Interpersonal relationship

The relationship between employees and corporate bodies must be based on mutual respect, loyalty, cooperation, honesty and clear communication, in the joint search for the excellence of the collective results.

## **Integrity and loyalty**

The use of a hierarchical position, as well as the image, name or Saphety brand is prohibited, for personal benefit, for the benefit of any family member or any third party. In the exercise of their functions and in the internal and external relationship, the employees must adopt a suitable and dignified behavior, safeguarding the prestige of the company and its brands.

## **Responsibility**

Employees must exercise their functions in a responsible and professional manner, protecting the company's assets through a sensible and rational use of the resources.

## **Confidentiality**

Employees are obliged to protect the confidentiality of the information to which they have access in the performance of their duties, not being able to use it to obtain benefits for themselves or for third parties.

## **Inside information and information abuse**

Employees who have access to inside information, in any context, are expressly prohibited from transmitting it, using it or facilitating its use by third parties for their own benefit.

## **Sustainability**

It must be adopted as a responsibility shared by all employees.

## **Conflicting interests**

Employees must not intervene in decision-making processes that involve, directly or indirectly, organizations they collaborate or have collaborated with or people with whom they are or have been linked by kinship or friendship

ties. In the impossibility of abstaining themselves from intervening in the above-mentioned processes, all the employees must inform their respective hierarchical superior about the existence of these relationships.

Employees must abstain themselves from participating or exercising functions in organizations in which the activity to be carried out may come into conflict with the fulfillment of their duties at Saphety or whose purposes may be contrary to those of Saphety.

### **Non-competition**

Employees can't engage in activities that compete with those developed by Saphety.

## **Assets protection**

Saphety's assets are exclusively for professional use, their use for own benefit or that of others is prohibited.

It is the responsibility of all employees to ensure the protection and conservation of the physical, financial and intellectual assets of the company, and the resources must be used efficiently. Whenever possible and recommended, the intellectual capital of the company should be protected by registering and patenting it.

Employees must behave according to the safety rules, preventing accidents from occurring and not placing the company's assets at risk.

Employees must take care of the company's financial resources with great diligence, protecting them from loss, theft or misuse.

The sale of Saphety's fixed assets to company employees is not allowed.

Exceptions must be approved by the administrators.



# Shareholders

## Creation of value

Saphety is engaged and committed to maximize, in a sustainable manner, the creation of value for its shareholders, in strict compliance with the company values.

## Accuracy

All the financial and management information will provide in a faithful, current, complete and true manner, the company's equity situation, its results and responsibilities, as well as the more relevant adopted policies.

## Inside information and information abuse

Ensuring the respect for the protection and the non-abusive use of privileged information, imposing on its employees the strict compliance of the current legal or regulatory rules.

# Suppliers

## Selection responsibility

Saphety selects its service providers and suppliers based on clear and impartial criteria. One of the selection criteria is that they comply with conduct standards that are not in conflict with those contained in this Code.

## **Integrity**

To act with loyalty and good faith in the relationships with its business partners, establishing a clear and objective communication with them, seeking the consolidation of a long-term relationship of trust.

## **Transparency**

Saphety adopts procedures guided by principles of economic rationality and efficiency. Its business practice is transparent and equitable and will not tolerate any form of abuse and bribery, corruption or money laundering.

# **Public authorities**

## **Cooperation**

To have a cooperative attitude with public authorities and local communities, guided by transparency and independence standards, with total availability and openness to improve the legal environment of its businesses.

## **Independence**

To have a posture of independence regarding public institutions and political parties, without prejudice of the professional nature relations

## **Respect/Obligation compliance**

All the legal or contractual obligations are met, in the geographic locations where it operates.

# Communities

Saphety is deeply concerned about the environment, the economic and social well-being and the development of human knowledge. Saphety develops several actions in the scope of social responsibility, encouraging its employees to adopt social responsibility habits and sustainability practices.

# Competitors

## **Cordiality and mutual respect**

Saphety promotes a fair and healthy competition, and its relationship with competitors obeys rules of cordiality and mutual respect.

# External communication

## **Disclosure of information**

Implementation of a strict communication policy, guided by ethical standards, integrity and transparency with the media, safeguarding confidentiality and the preservation of confidential information within the company's interests.

Saphety acts to ensure the symmetry when accessing information, in full respect of the applicable legal and regulatory rules, avoiding mistakes, exaggerations and concealment of relevant information.

# Environment

Saphety is focused on preserving the environment, namely through an eco-efficient management that minimizes environmental impact.

# Disclosure

This code is published and can be checked internally at <https://alm.saphety.com/confluence/pages/viewpage.action?pageId=49907777>, in order to consolidate the application of the principles and the adoption of the behaviors provided therein. Whenever requested, it will be digitally shared with Saphety stakeholders.

At the time of the formalization of the employment contract, all Employees sign a declaration attesting to know the Code and the individual commitment to its compliance.

Any question related to the interpretation or application of this Code should be reported to the Ethics Committee ([comissaodeetica@saphety.com](mailto:comissaodeetica@saphety.com)).

# Committee for Ethics and for monitoring the application of this code

In order to guarantee the compliance with what is described in this Code of Ethics and Conduct, Saphety's Excom has appointed the Ethics Committee, which has the following premises:

- Guarantee the means for disseminating the Code of Ethics and Conduct to its recipients;
- Analyze the questions sent by employees, partners or third parties, addressing the recommendations that it considers appropriate to the nature of the case;
- Verify the existence of internal mechanisms for communicating irregularities, ensuring that they comply with the legal norms, namely in terms of confidentiality, of the information handling process and of the absence of reprisals against those who communicated the irregularities;
- Approval by Saphety's administrators of all the changes made to the Code of Ethics and Conduct, whenever deemed appropriate;
- Issue clarifications on the interpretation of any provision of the Code of Ethics and Conduct;
- Receiving, evaluating and forwarding to Saphety's administrators the irregularities communicated non-anonymously to the Ethics Committee, whenever they, in their understanding, indicate the existence of a violation of the rules of this Code of Ethics and Conduct;

The reporting of irregularities shall be communicated non-anonymously to the Ethics Committee's email address.

The confidentiality reserve is guaranteed in relation to the reporting of acts of irregular financial management, under the terms authorized by the National Data Protection Commission.

Two Ethics Committees were created, one of which will only be triggered when irregularities exist.

### **Ethics Committee Members**

- Rui Fontoura (Administrator | CEO) \*
- Paulo Gonçalinho (Administrator | CFO) \*
- João Pereira (Administrator | CCO) \*
- Ana Fava (Head of People Culture) \*
- Nelson Santos (Project Manager)
- Pedro Sepúlveda (VP Sales)

\* Summoned in case of irregularities.

## **Meetings**

The Ethics Committee meetings notice, the agenda preparation, as well as the orientation/direction of the works will be the Head of People Culture responsibility.

The Ethics Committee will meet at least once a year or whenever necessary.

As a result, minutes of the Ethics Committee meetings will be created and copies will be distributed to all members.

# Procedures to follow in case alleged irregularities are received

The main procedures to be followed regarding the disclosure and investigation of any irregularities received are the following:

- Response to the complainant to confirm the irregularity was received. This response can be sent by mail or e-mail;
- All the communications of possible irregularities received by mail or e-mail addressed to the Ethics Committee must be shared immediately with all members of the Committee;
- The Ethics Committee must use all the means at its disposal, including the recommendation to use specific internal or external resources, to ensure that any alleged irregularities, within the scope of its functions, are subject to a rigorous and timely investigation, to ensure that the Ethics Committee reaches an independent opinion;
- During the investigations, or on their partial or final conclusion, the Ethics Committee can issue recommendations, including indications of who should implement them, within the scope of its function to ensure that the Code of Ethics and Conduct is effectively applied;
- When the investigation is complete, a notification must be sent to the people involved in the process.

June 1st, 2020

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