

IDEPA CODE OF ETHICS

INTRODUCTION

Ethics between the management, its partners, directors, and all other stakeholders is an essential element for the proper fulfillment of its objectives, as it represents a fundamental requirement to ensure and balance the rights and interests of all parties involved.

Ethics presupposes the strict compliance by the company regarding applicable laws, legal and institutional standards, as well as identified good practices. This applies to all levels of the organization: partners, employees, managers, and directors. Each of these people - personally or collectively - must set up their activities in the service of wealth generation when compatible with sustainable environmental and social development.

This Code was created to encompass all companies that relate to IDEPA, with a general framework, adaptable to the specific circumstances of each business, guaranteeing the principles of ethics and sustainability.

RESPONSIBILITIES OF MANAGEMENT

Run the company with a medium and long-term vision, never compromising its continuity for interests other than the goals and strategies that guarantee that continuity.

Exercise the right to vote on Management Councils and make informed and responsible decisions, requiring for this purpose an ethical behavior from all persons and entities involved in decision-making, including the approval and effective application of this Code of Ethics.

Seek a fair balance between the pursuit of profits and values to be invested in the Company, in order to ensure its sustainability.

Ensure compliance employee salary payments, practicing fair remuneration for work performed and skills. Facilitate transparency and control of employee remuneration in order to ensure adequacy to the level of individual responsibility and performance.

Ensure compliance with payment deadlines to all suppliers and partners, as well as all tax obligations.

Collect outstanding balances with the diligence required in each case.

Assign responsibilities to people who have the corresponding skills, preparation and adequate experience, in order to guarantee the professional and ethical performance of their roles.

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Prepare and maintain a succession plan for key positions within the company in order to ensure its continuity.

Choose its employees and subordinates according to the principles of merit and ability, seeking to satisfy the interests of the Company and its partners.

Define and defend the company's mission and values according to its Code of Ethics.

RESPONSIBILITIES OF DIRECTORS

To carry out their activities in a professional, ethical and responsible manner.

Comply with and require compliance with the Company's Code of Ethics, disseminating it and establishing appropriate mechanisms to ensure its application and correct any infractions.

Comply with and require compliance with applicable norms and good practices, establishing internal and external management and monitoring systems for this purpose in accordance with the interests and objectives of the Company.

Rigorously, accurately and reliably maintain the records previously defined, allowing the necessary information to be a tool to support correct and responsible decision-making. Provide external and internal auditors of the Company with all requested information and explanations.

Subordinate their interests to those of the Company when acting on its behalf and in its representation, never using their assets for their own benefit, except with explicit knowledge and prior authorization from Management.

Immediately communicate to Management any event or situation that represents or may give rise to a conflict between the interests of the Company and individual interests, refraining from intervening in the deliberation.

Maintain confidentiality about all data, information and documents to which they have had access by virtue of their responsibilities in the position, even when these have already ceased.

Make every effort to ensure the promised quality of the Company's products and services and deal with complaints quickly and efficiently, aiming for satisfaction beyond mere compliance with current legislation.

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PURCHASE RESPONSIBILITIES

To maintain ethical and lawful relationships with suppliers of goods and services.

Seek and select only suppliers whose business practices respect human dignity, do not violate the law and do not jeopardize the Company's reputation and its good relationship with customers.

Select suppliers based on the suitability of their products or services, as well as their prices, delivery conditions and quality.

Do not accept or offer gifts, presents, commissions or any benefits of a personal nature or that are susceptible to such interpretation, under any pretext.

Respect all local and international laws on import, export and trade. Require business partners, including suppliers, to ensure that their products are properly classified, labeled and accompanied by all documentation, licenses, authorizations and approvals required in accordance with all local or international laws or regulations on import, export and trade.

The Company, as well as its suppliers, should not market or sell to countries, organizations or persons restricted or sanctioned by applicable laws.

IDEPA's business partners must take care of the assets entrusted to them, using them appropriately, legally and responsibly, protecting them from misuse or damage.

Verify that personal use or personal gain is not made from the use of IDEPA's physical or electronic assets. In addition, business partners are encouraged to follow our information system policies and apply good cybersecurity practices to keep our systems and networks running smoothly and free of viruses. Care should also be taken when using approved hardware and software applications when interacting with our systems and networks.

SALES RESPONSIBILITIES

Sales, supplies and services, as well as any type of investment made on behalf of IDEPA, should not bring any illicit benefit or gain to any of the employees involved. Such transactions should always be carried out in the best interests of IDEPA and, where possible, to increase its competitiveness.

Any type of negotiation should never be used to obtain or grant loans of favor, travel, payments, financing or any other type of personal advantage or favor.

Any employee of the Company who comes across a business opportunity that has not been previously considered as a result of relations with a customer or arising from their functions at IDEPA has a duty

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to inform their hierarchical superior or Management itself about the opportunity in question. Ultimately, it is Management that decides whether the opportunity found should or should not be seized by the Company and can never be a personal decision of any employee.

IDEPA undertakes not to abuse a dominant or privileged market position if it is infringing the law on free competition. It thus intends to compete in good faith with other companies, cooperating to achieve a free market based on mutual respect between competitors and abstaining from unfair practices. It is the Company's commitment not to win customers from its competitors using unethical methods.

INTEGRITY - ANTI-BRIBERY / ANTI-CORRUPTION

We expect all our business partners to maintain a high ethical standard.

We expect them to conduct their business ethically and without engaging in bribery, misappropriation, extortion or other corrupt practices.

Business partners should never directly or indirectly accept / offer bribes or commissions in exchange for undue commercial advantages. Business partners must comply with all applicable anti-corruption laws in their country.

IDEPA is also committed, but not limited, to compliance with Decree-Law no. 109-E/2021, which creates the National Anti-Corruption Mechanism and establishes the general regime for the prevention of corruption in Portugal.

A conflict of interest or even real corruption can arise when personal, social, financial or political matters can or appear to influence business decisions and interfere with IDEPA's interest in complying with environmental and social laws. It can exist in various forms and IDEPA's Code of Ethics cannot describe them all. It is up to each IDEPA employee and each person who interacts with our Company to rely on their own judgment, honesty and moral principles.

FORBIDDEN CONFLICTS OF INTEREST:

- Any activity or work carried out directly or indirectly for competitors or companies that raise suspicions about their market positioning relative to the Company, in parallel with their work with our Company.
- Acting in favor of our suppliers or customers with the aim of preferring their interests to those of our company.
- Accepting rewards and financial or other benefits or a promise of them for oneself or for any other person, from our business partners.

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- Participation in decision-making or making direct decisions that may result in personal benefit or for a close person.
- Making decisions in the context of their professional activity that may be influenced or appear to be influenced by personal, family or friendship interests.
- Company investments or stakes in other supplier or customer companies if it is not guaranteed that this fact will not influence the decisions made at IDEPA, or if IDEPA's interests are not met.
- Using IDEPA's industrial property, obtaining information or resources internally, for personal gain or for third parties.
- Making personal profit by providing services to third parties or using authority in the company for the benefit of third parties.
- Involvement in activities contrary to or that may appear contrary to IDEPA's interests. Corrupt activities, such as promising, offering, authorizing, giving, or accepting anything of value, directly or indirectly through third parties, in order to obtain or retain business, direct business to anyone or obtain an improper advantage, are a violation of this Code and may also be a serious violation of criminal and civil laws relating to bribery and corruption.

How to report: The reporting of any practice of corruption or any practice that in your fair judgment appears to constitute an act of corruption can be communicated directly to IDEPA Management.

Telephone: + 351 256 201 700

E-Mail: idepa@idepa.com or rh@idepa.com

CIVIL RESPONSIBILITIES

- Respect human rights and democratic institutions, promoting them whenever possible. As a demonstration of respect for the different opinions and sensitivities of people related to the company, IDEPA and anyone acting on its behalf must maintain the principle of political neutrality in relation to any type of community that does not act against human rights.
- Maintain lawful and respectful relations with public authorities and institutions, not accepting or offering gifts or commissions in cash or in-kind.
- Make contributions to political parties or public institutions only in accordance with current legislation and, in any case, ensuring total transparency.
- Collaborate with public entities and non-governmental entities or organizations dedicated to improving social attention levels for disadvantaged people.
- Respect IDEPA's SOCIAL POLICY internally and promote it externally.
- Respect IDEPA's ENVIRONMENTAL POLICY internally and promote it externally.