

CODE OF ETHICS AND CONDUCT



BEING jp

JP Sá Couto, SA has a history spanning more than three decades. This journey has been an incredible adventure. We have evolved from a Portuguese company providing technical assistance to a leading player in Education Technology (EdTech), applying that knowledge to projects that place technology at the service of human development.

On a global scale, we lead a long-term technological revolution in education, democratising access to information and technology. Every day we inspire equality and knowledge, transforming the lives of millions of students and hundreds of educational communities in dozens of countries through our international brand jp.ik. We are proud of the contribution we have made to democratising knowledge and digital skills, creating opportunities in communities that aspire to a more sustainable future.

Throughout this journey, the world has changed and so have we. But we have kept our identity, our principles and our essential values intact.

Our actions are guided by a set of values — Ambition, Humility, Integrity, People, Innovation — and ethical principles, described in greater detail in this Code of Ethics and Conduct (the “Code”); principles by which our companies guide their activity and their relationships with stakeholders.

The key to this success is our commitment to and respect for the ethical values and principles that govern our companies. We are committed to creating economic value based on relationships of Ethics and Trust with all stakeholders.

Our ethical conduct, more than an ideal, must be a continuous process that requires constant attention from everyone.

This Code addresses all of this in a simple but unequivocal way: it reminds us of our values and of a set of principles that govern our activity, together with a set of ethical and deontological rules to be observed by employees, ensuring a standard of integrity, respect and transparency in their relationships with all Stakeholders.

It is also intended for third parties contracted by, or acting on behalf of, the company in cases where the company may be held liable for their actions.

The Code further tells us that, if we suspect violations of the principles defined therein, we must report such situations, with guarantees of confidentiality and non-retaliation.

With Ambition and Humility, we invite our employees to read this Code, to identify opportunities for improvement and to send us suggestions. The invitation extends to all stakeholders.

This Code is intended to be a living document, open to permanent improvement, and it is the duty of all of us to make Ethics come to life in our daily activity.

We have “done what we say”. With this Code, we are “saying how we intend to do it”, which requires our practices to be consistent with our words. By communicating the ethical manner in which we wish to act, we are making a commitment to which we must remain faithful.
This is a challenge addressed to everyone, and it begins with us.

Life is full of challenges. And the challenge of ethical conduct is one of the most valuable. We believe it is worth embracing - not only because ethics contributes to reputation, prosperity and healthy coexistence, but above all because it is the right way to act.

The Board,

Jorge Sá Couto

João Paulo Sá Couto



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01. General Provisions

1.1. Scope of Application

This Code covers the activities of the companies JP Sá Couto, SA, JP Holding Services, SA and Imotsu Sociedade Imobiliária, Ldª (the “company”) and applies to all employees, regardless of the nature of their employment relationship or the regime under which they perform their duties, as well as to all entities contracted by, or acting on behalf of, the company in cases where these may be held liable for their actions. “Employees” shall mean members of corporate bodies, managers, workers and trainees.

1.2. Purpose

This Code establishes the set of principles, values and rules of conduct of the company in matters of professional ethics and conduct, and constitutes a reference for the standard of conduct required of its employees in their relationships with third parties, taking into account the criminal rules relating to corruption and related offences and the risks of the company's exposure to such crimes.

It sets out the company's values and ethical principles of action and the way they should be reflected in its relationships with the various stakeholders. By stakeholders is meant: a person or organisation that may affect, be affected by, or consider itself to be affected by a decision or activity. This category includes, in particular but not exclusively: employees, shareholders, clients, suppliers and service providers, counterparties, business partners, competitors, public and regulatory authorities, financial entities and local communities.





01. General Provisions

The Code is intended to be a tool to support decision-making in relation to the ethical and conduct issues we face in our relationships with stakeholders. These issues are, by their nature, difficult and often complex. The Code aims to assist in those decision-making processes and to reinforce our ethical culture. Considering the changes that characterise our sector and the diversity of contexts in which we operate, the Code should be a living, evolving element. We must therefore revisit and review it with the same eagerness for improvement that has brought us this far.

02. Our “Way of Being”

We aim to be a trustworthy company — one that honours its commitments, that uses the right means to achieve its ends and that cares about people: those who work with us, but also those in the communities where we operate, and all those who, directly or indirectly, are touched by our activity, products or services. To this end, we must pursue two essential goals.

Firstly, we must act in accordance with essential principles of action:

- Respect the law.
- Respect the privacy of persons and entities, as well as the confidentiality and integrity of information.
- Manage responsibly and protect assets and resources — our own and those of third parties in our care.
- Provide truthful, accurate, objective and clear information.
- Avoid conflicts of interest.
- Comply with the rules on hospitality and gifts.



02. OUR “WAY OF BEING”

OUR ESSENTIAL VALUES

Secondly, these principles of action must be encouraged by our values:

Ambition, Humility, Integrity, People, Innovation

These values are essential for the following reasons:



Ambition

Helps us to look to the future with determination. It allows us to identify ways of meeting each client’s needs, today and in the future. Ambition also drives us to be ever better — in our products and services, but also in our processes. In this way, we become better equipped to act in pursuit of our mission.



Humility

Helps us to keep our feet on the ground, not to be dazzled by success, to learn from mistakes, to acknowledge our shortcomings and to respect the strengths of other parties. It is humility that helps us celebrate our successes wisely and without complacency.



Integrity

For our ambition to be a factor of sustainable progress and to help us be what we want to be — a trustworthy company — we must act with integrity and respect, so that our other values are consistent with our mission and we earn the trust of all those we serve. If we are ambitious and humble but do not act with integrity and respect, we run the risk of doing things right but not doing the right things.



People

We build genuine and trusting relationships with our people, our clients and our partners.



Innovation.

We create sustainable, unique and differentiating technological solutions, promoting social inclusion.

We look to the future guided by the vision of being a global benchmark in sustainable technology, driving a more inclusive digital future.
And we move forward reaffirming our mission to create and deliver sustainable, innovative technological solutions that boost digital transformation, promoting social inclusion, with respect for natural resources and acting with integrity.

Our “way of being” therefore involves our identity (a trustworthy company), our principles of action (how we act in order to deserve that trust) and the values that underpin those principles in our action.

2.1. Principles of Action

2.1.1 Compliance with Legislation

Technical competence in the performance of duties is crucial, but it is not sufficient. The Board must take the aforementioned values into account when recruiting and selecting employees, and when training and promoting them.

We act in accordance with the legislation and regulations in force in the regions where we operate. We cooperate with the authorities in cases of investigation. We also believe that ethical business conduct sometimes requires more than mere compliance with the law. And we know that some business actions may not be covered by law. For these reasons, we understand that compliance with the law represents only one of the components we must consider when assessing the correctness of our decisions.

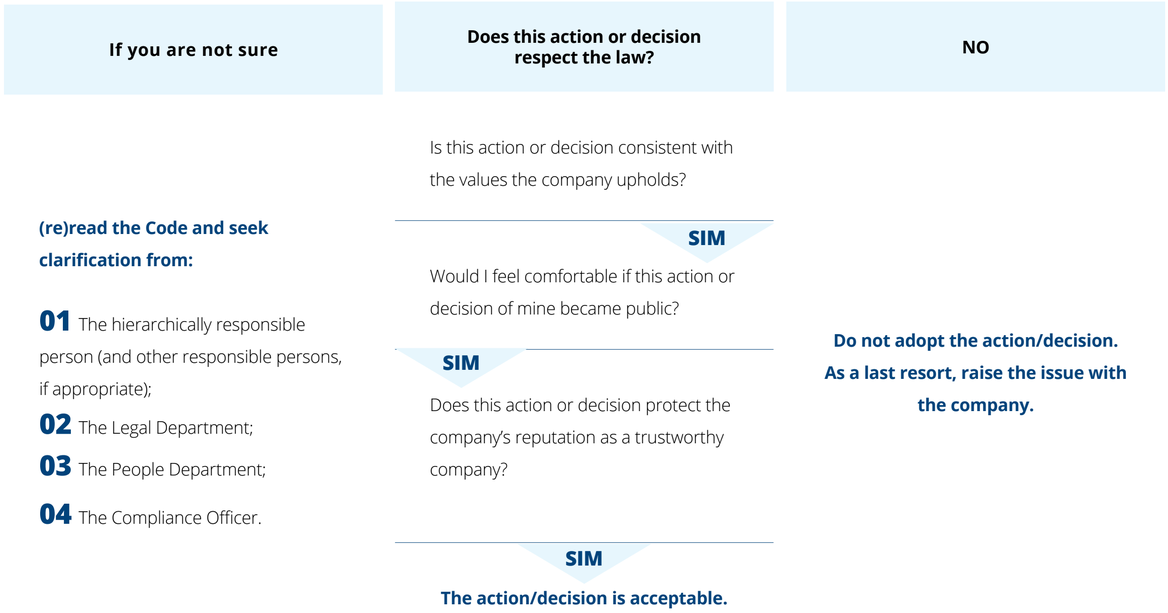

Figure 1: : How to proceed before any action or decision

2.1.2 Privacy, Confidentiality and Integrity of Information

The matter of privacy, confidentiality and integrity of information is dealt with in the Policy for the Prevention of Corruption and Related Offences and in the Privacy Policy.

2.1.3 Communication

Within a relationship of trust, the information we provide to clients, suppliers and service providers, shareholders/partners and employees must be truthful, accurate, objective and clear. In rendering accounts, we do not conceal relevant information about our economic, social or environmental performance. All information provided to the media, or disclosed on social media or any other external means or channel, must be provided by authorised persons — or after authorisation by the Board or appropriate body..

Figure 2

Before expressing ourselves on social media about any matter involving the company, we must answer the following questions:



In case of doubt, please contact: comunicacao@groupjp.com



2.1.4 Management and Protection of Assets and Other Resources

In managing the resources and assets (our own and those of third parties, tangible or intangible) entrusted to us, we respect their integrity and safeguard their value. To this end, we must take care to protect and preserve the assets and resources made available for the performance of our duties (or to which we have access by virtue of those duties), protecting them against fraud, theft, alteration or loss resulting from acts of third parties. We must also make rational and efficient use of resources and, in particular, must not improperly use the company’s resources for personal purposes.

Examples of what is meant by assets and other resources include: money, buildings and equipment, furniture, hardware and software, information, working time, and electronic resources (i.e. email, networks, systems).

2.2. HOW WE RELATE

The relationships we develop among ourselves, as employees, and our relationships with other stakeholders, must be guided by the values and principles of action set out in this Code.

2.2.1 Among Ourselves

We work continuously to provide our employees with high levels of satisfaction and professional fulfilment. With this in mind, we provide opportunities for personal and professional training and development; we promote equal opportunities; we respect diversity; we provide appropriate health, hygiene and safety conditions; we recognise and reward merit; we are guided by fairness and by procedural and relational justice between the Board and employees; and we promote the balance between professional and personal/family responsibilities.

In short, we provide a respectful, fair, healthy, inclusive working environment, safe for the expression of opinions, and free from prejudice and unjustified discrimination.



As employees, at all levels, we commit to:

- Collaborating and working as a team in an open, transparent, constructive and respectful way, ensuring that the result of the team's joint work is greater than the sum of individual efforts;
- Contributing to collaboration between teams;
- Dealing with conflicts of ideas and opinions without making personal attacks;
- Expressing our opinions freely, respectfully and responsibly;
- Respecting the opinions of others, particularly when in management roles;
- Acknowledging mistakes and failures and learning from them;
- Investing in professional development and the continuous improvement of our knowledge and skills, making the best use of training and development opportunities provided by the company;
- Acting in a professional, responsible and loyal manner towards the company, striving to comply with established policies and to safeguard the company's reputation in all situations;
- Reporting conduct that conflicts with the values of respect and dignity emphasised in this Code, and specifically in this section.

The Board, Directors and Area Managers have a fundamental and increased role in advancing the ethical culture, demonstrating it in the performance of their own responsibilities and duties and in supporting employees in accordance with our principles, values and rules of action.

The Board, Directors and Area Managers commit to:
- Creating the conditions for ethical issues to arise and be discussed;
- Being available to listen to employees' concerns;
- Recognising and valuing ethical behaviour.

2.2.2 With Suppliers, Service Providers and Business Partners

jp.ik recognises the importance, for the sustainability of its activity, of the relationships of trust and respect that it establishes with suppliers, service providers and business partners.

Relationships with suppliers, service providers and business partners must be ethical, transparent and in good faith, and must respect the provisions of this Code, as well as those of the Policy for the Prevention of Corruption and Related Offences.

In the same vein, jp.ik expects that suppliers, service providers and business partners — as part of its value chain and therefore likely to influence its performance — will reciprocally undertake the commitments assumed by jp.ik and likewise ensure, with their own suppliers, service providers and business partners, adherence to and promotion of the practices, principles and duties set out in this Code.

jp.ik expects from its suppliers, service providers and business partners the commitment to comply with, and to enforce compliance with, this Code of Ethics and Conduct.

2.2.3 With Competitors

We engage in rigorous and fair competitive practice. To this end, we observe market rules and criteria, we respect the material and intellectual property rights of competitors, we do not develop activities or programmes that represent abuse of any strong market position, and we do not enable other forms of unfair competition such as (a) market-sharing agreements, (b) price-fixing agreements and (c) obtaining commercial information through illegal means. In addition, we respect all of each competitor's products and services.



2.2.4 With Clients

Each client is unique; however, there is a common thread among them all: they enable our products and services to reach populations and they help us to fulfil our mission. With a view to being a foundation of quality and trust, we commit to ensuring each client access to all information about products, services and prices, in order to support decision-making. Our motto is: every client has the right to make an informed purchase, and we have the corresponding duty. We are aware that each client's satisfaction is a condition for the pursuit of our mission.

As employees, at all levels, we commit to:

- Engaging with each client in an honest, accurate, professional, dedicated, respectful, frank and courteous manner;
- Providing them with the information that allows them to make an informed purchase;
- Providing them with an efficient customer service and support;
- Supplying them with safe and reliable products and services;
- Complying scrupulously and to the highest standard with the agreed terms and conditions regarding the execution of the business and the quality of the product or service;
- Being attentive and immediately and responsibly communicating any problem with our products and services that comes to our knowledge.



2.2.5 With Governments, Public Bodies and Public Bodies in Regulatory or Supervisory Roles, and with Political Parties (Lobbying)

In our relationships with governments and public bodies in regulatory or supervisory roles, whether national or regional, and in responding to their requests, we commit to responding in a timely, transparent and proper manner, providing information, comments or contributions on matters relevant to the communities in which they operate. Likewise, we commit to providing the supervisory and inspection authorities with all necessary cooperation, meeting their requests in a rigorous, transparent and timely manner.

We adopt a position of independence in relation to political parties, without prejudice to commercial or professional relationships. Under no circumstances do we finance political parties or organisations whose mission is essentially political, nor do we exert any influence on political and/or legislative decision-making processes.

As individuals and citizens, we have the right to support political parties or associations and to express our political opinions freely, but in a unilateral and personal way — never as representatives of the company.

2.2.6 With the Community

We believe that strong companies make stronger communities and vice versa. We act with a sense of responsible citizenship in the communities in which we operate, seeking to be — to the extent that the scale of our activity allows — agents of economic and social development. We want to be recognised as a trustworthy group also in our relationships with these communities.

Our businesses can be a factor of positive transformation in society (particularly with children and young people) and we want to make proper use of that potential to deserve the trust of those we engage with. Living up to our duty to the broader community, we also respect the environment by complying with applicable laws and regulations. We work to minimise the environmental "footprint" generated by our business activities and we act sensibly in the management of water and energy use and in waste treatment.

As employees, at all levels, we commit to:

- Supporting, whenever possible, community-oriented initiatives developed by the company;
- Submitting suggestions whenever we identify opportunities for improvement related to the management of environmental resources.

Relationships with people and entities of other countries and regions

In relationships with people and entities of other countries and regions, we must seek to understand their cultural particularities.

When relating to people and entities from other cultures, we must make a prior effort to understand cultural differences. We must also have the humility to accept and value those differences. We must inform ourselves of the cultural particularities in which our counterparts operate, through information obtained from credible sources and, ideally, from more than one source.



03. INTEGRITY AND BUSINESS CONDUCT

3.1. CORRUPTION AND RELATED OFFENCES

Corruption and related offences are understood to mean the crimes of corruption, undue receiving and offering of benefits, embezzlement, economic participation in business, extortion, abuse of power, malfeasance, influence peddling, money laundering, and fraud in obtaining or diverting subsidies, grants or credit.

We repudiate all such conduct, and employees and third parties with whom we associate must likewise refrain from such practices.

This matter is dealt with in the Policy for the Prevention of Corruption and Related Offences.

3.2. GIFTS AND HOSPITALITY

Gifts and Offers can form part of business relationships. However, in order to avoid raising ethical doubts, they must comply with certain rules. They must be courtesy gifts, of symbolic value, and must respect local culture, values and customs. In our relationships with clients, suppliers, governments and other public bodies and political parties, we must refuse payments or other favours that may be interpreted as attempts at corruption, bribery or any kind of preferential treatment.



Figure 3 | As employees, before accepting, requesting, promising or offering professional courtesies, we must reflect on 3 essential questions:

If we answer "yes" to any of these questions, we must avoid offering or receiving the gift or offer.

You may consult this topic, developed further, in our Policy for the Prevention of Corruption and Related Offences.

3.3. CONFLICT OF INTERESTS

A conflict of interests exists when we have an economic or personal interest in an interaction involving the company in some way.

A conflict of interests can impair our objective judgement, our impartiality and our loyalty as employees, leading us to actions and decisions detrimental to the company which, if discovered, may damage its reputation. As a principle, therefore, we must avoid intervening in decision-making processes involving, directly or indirectly, organisations with which we collaborate or have collaborated, or persons and entities with whom we are, or have been, in contact through ties of kinship or affinity.

If our participation in such processes is necessary for the benefit of the company, it is our duty to inform our hierarchical superior.





3.4. FINANCIAL RESPONSIBILITY, TRANSPARENCY AND DISCLOSURE OF INFORMATION

We promote the disclosure of information regarding the financial position and performance and the investments made by the group's companies, adopting a stance of transparency in our financial information. Only in this way can the trust of the public, shareholders and business partners be maintained.

We strictly comply with all the legal obligations we must ensure, guaranteeing their continuous fulfilment through the performance of regular financial audits for statutory purposes and a second line of external audits.

Should irregularities arise, this may have serious consequences for the companies.

04. SUSTAINABILITY

The United Nations defines sustainability as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

For us, sustainability management is one of our fundamental pillars; we walk together towards sustainability, reaffirming our mission to create and deliver sustainable and innovative technological solutions that boost digital transformation, promoting social inclusion, with respect for natural resources and acting with integrity.

In this sustainability strategy, we are organised around the three ESG pillars (Environment, Social and Governance), which frame the areas of action considered critical to strengthen competitiveness, ensure regulatory compliance, create sustainable value and respond to the expectations of clients, employees, partners and other stakeholders.



4.1. ENVIRONMENT

For us, the Environment is crucial, because it is our present and our future. It is our way of being. We work daily on improving the company's environmental performance, on environmental legal compliance and on the control and monitoring of significant environmental aspects.

We work to drive technological progress without compromising the environment: mitigating the impacts of climate change, reducing pollution and adopting the circular economy in technological solutions.

- jp.ik is certified to ISO 14001:2015 (Environmental Management) and ISO 50001 (Energy Management);
- Our products are certified to ensure that they are environmentally safe and sustainable, ensuring that we contribute to a better and cleaner ecosystem;
- We manage resources and waste efficiently, integrating circular economy practices that allow us to minimise the consumption of materials and the production of waste, increase reuse and recycling rates and choose the most sustainable solutions, minimising the impact of our activities on the environment;





• We adapt our vehicle fleet by choosing hybrid and electric vehicles;
• We have a maintenance plan to control and monitor losses by identifying water-leak points;
• The hand-towel paper used in our companies is 100% recycled and biodegradable;
• Our supplier selection processes take into account the environmental criteria of those companies;
• Our printing systems are equipped with a system designed to reduce paper and toner waste;
• All materials used in equipment packaging, batteries and accumulators are managed by accredited partner entities that take responsibility for the proper routing and treatment of such waste.

4.2. SOCIAL

We see people as the foundation of the company's success, ensuring that they have the best working conditions in a healthy and safe environment.

By meeting the needs of clients and communities, we contribute to a technologically advanced and therefore more inclusive society.

- We are certified to ISO 45001 — Occupational Health and Safety;
- We strive to be a great place to work, promoting the satisfaction, motivation and consequently the productivity of our people;
- We contribute to the sustainable development of local, national and international communities, to the population's quality of life, and to equity and social justice through donations and investment;
- We support social and educational initiatives within the communities where we operate;
- We contribute, through patronage, to the socio-economic development of the communities where we operate.



At jp.ik we undertake to promote ethical, transparent and socially responsible practices in all our activities, setting standards to ensure that working conditions in supply chains are safe and that business is conducted responsibly, ethically, and with respect for human rights and the environment.

The provisions of this Code respect internationally recognised standards, including:

- OECD Guidelines for Multinational Enterprises;
- UN Guiding Principles on Business and Human Rights;
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work;
- Fundamental ILO Conventions;
- UN Universal Declaration of Human Rights.

In this regard, we commit to:

I. Not supporting, permitting or benefiting from:

Child labour: we do not tolerate any form of child labour or child exploitation; (1)

Forced labour: we do not tolerate any practice of forced, slave or servile labour, involuntary or abusive prison labour, slavery or human trafficking; (2)

Any form of discrimination, including on the basis of gender, age, origin, religion, sexual orientation, disability or any other condition protected by law; we do not tolerate any form of discrimination in recruitment, remuneration, access to training, promotion, termination or retirement.(3)

1. Ensuring all employees:

- Dignified treatment, with respect, equity and the promotion of equal opportunities; (4)
- Safe and healthy working conditions, preventing risks and promoting well-being; (5)
- Fair remuneration, ensuring compliance with applicable legislation, including that relating to minimum wage, overtime and statutory benefits, and the right to a living wage; (6)
- Compliance with the legal provisions and sectoral agreements relating to working hours, ensuring that the working day does not exceed the maximum laid down therein;
- Respect for the right to freedom of association and collective bargaining; we recognise, respect and protect the right to freedom of association, including the formation of, membership in and participation in trade unions or other representative organisations, as well as the right to collective bargaining, and we ensure that no employee will be harmed, discriminated against or subject to retaliation for the legitimate exercise of those rights.(7)



2. Maintaining an implemented Social Responsibility Management System, in order to monitor social performance and promote its continuous improvement;
3. Promoting, raising awareness of, and monitoring compliance with these principles among our suppliers, partners and other entities in the value chain, encouraging the adoption of practices aligned with this Code.

Also within this scope, we have elected an employee representative whose role is to act as a liaison between employees and the Board, facilitating communication, participation and continuous improvement in compliance with the SA8000 standard.

1) according to ILO C138, C182 and UN Convention on the Rights of the Child, Article 32
2) according to ILO C029, C105 and C190
3) according to ILO C111
4) according to ILO C100
5) according to ILO C155, C187 and R164. A safe and healthy working environment is a jp.ik fundamental priority and we expect our suppliers to comply with Occupational Health and Safety Supplier Requirements.
6) according to ILO C131. We respect all applicable local and national health and safety and labor laws effective in the country of manufacture, and a maximum 60-hour workweek including overtime
7) according to ILO C087 and C098.

4.3. GOVERNANCE

We have a strong concern for the social impact of our policies and the transparency of our corporate governance principles and regulations. We have adopted robust principles of ethical management and compliance in the way we manage our economic activity, in order to ensure responsible business conduct, communicate responsibly and transparently, and continue to innovate, always fostering a culture of integrity.

To this end, we implement programmes for:

- Data Protection;
- Ethics and Conduct.

We also implement:

- An anti-bribery management system implemented in accordance with NP ISO 37001, which plays a central role in reinforcing the company's ethical culture. This international standard sets out requirements and good practices for the prevention, detection and response to acts of bribery and corruption, integrating policies, procedures and controls that promote ethical conduct in all areas of the company. It also encourages leadership commitment, risk assessment, ongoing training, reporting mechanisms and the application of disciplinary measures, creating an organisational environment based on responsibility and compliance.





04. SUSTAINABILITY

The implementation of this system goes beyond regulatory compliance: it also represents a genuine commitment to ethics and integrity in business. By aligning the anti-bribery management system with the company's culture, jp.ik strengthens its values, promoting ethical behaviour and unequivocally demonstrating zero tolerance regarding corruption.

- A Regulatory Compliance Programme ("PCN") implemented in compliance with the Portuguese General Anti-Corruption Regime;
- A due diligence process, allowing additional control aimed at preventing and detecting the risk of corruption.

We also adopt a Responsible Minerals Sourcing Policy.

05. PREVENTION AND COMBAT OF HARASSMENT AT WORK

Subparagraphs (k) and (l) of paragraph 1 of Article 127 of the Portuguese Labour Code impose on employers the obligation to adopt codes of good conduct for the prevention of and combat against harassment at work, and to initiate disciplinary proceedings whenever situations of harassment at work come to their knowledge.

This addresses not only the fulfilment of this legal requirement but, above all, a commitment we have made to prevent and combat all conduct that affects the dignity of women and men at work, defining the guiding principles of a policy of zero tolerance towards such conduct.

5.1. GENERAL PRINCIPLES

We have a firm purpose to prevent the occurrence of any kind of harassment and, should it occur, to ensure the application of the appropriate measures to prevent its recurrence, ensuring the protection of human dignity, equality and non-discrimination, considering harassment at work as a violation of the concept of decent work.

In carrying out their activities, duties and responsibilities, the company and its employees must act with a view to pursuing those interests, with respect for the principles of non-discrimination and the combat against harassment at work.

Employees may not adopt discriminatory behaviour towards others or towards third parties on the basis of race, gender, sexual orientation, age, physical disability, political ideology, opinions and/or religion.

5.2. CONCEPT OF HARASSMENT

Harassment is understood to mean the practice of unwanted and repeated behaviour, in particular behaviour based on a discriminatory factor, occurring during access to employment or in the employment, work or vocational training itself, with the purpose or effect of disturbing or constraining the person, affecting their dignity or creating an intimidating, hostile, degrading, humiliating or destabilising environment for them.

Moral Harassment consists of verbal attacks of an offensive or humiliating nature, and/or physical attacks, and may encompass physical and/or psychological violence.

Harassment is Sexual when it consists of unwanted behaviour of a sexual nature, in verbal, non-verbal or physical form, or other behaviour by reason of sex or with sexual connotation that disturbs or constrains the person, affects the dignity of women and men at work, or creates for them an intimidating, hostile, degrading, humiliating or destabilising environment.



5.3. PARTIES INVOLVED

The author or victim of harassment (moral and/or sexual) may be any person and/or third party who interacts with the company.

Should the employee, supplier or client have well-founded suspicions of the occurrence of any kind of harassment, they should report it through the compliance channel.

06. Non-Compliance

The disciplinary penalties that, in accordance with the law, may be applied in the event of non-compliance with the rules contained in this Code, in the Policy for the Prevention of Corruption and Related Offences and/or in any other policy, regulation, work instruction or other internal rules, and/or in any law or legally binding regulation — as well as the criminal penalties associated with acts of corruption and related offences — are set out in the Policy for the Prevention of Corruption and Related Offences.



07. SPEAK UP MECHANISMS AND ANTI-RETALIATION MEASURES

We have a Compliance Channel that comprises a whistleblowing line and a social concerns line. Anyone who has knowledge of any violation of the provisions of this Code of Ethics and Conduct, of the Policy for the Prevention of Corruption and Related Offences, and/or of any other policy, regulation, work instruction or other internal rules, and/or of any law or legally binding regulation, or any concern, question, complaint, incident or claim relevant to the SA8000 standard, may report it confidentially through the following means:

- Contacting the hierarchically responsible person within the organisation;
- Contacting the Compliance Officer;
- Sending an anonymous or confidential message through the compliance channel.

The receipt, registration and handling of reports and social concerns must respect the provisions of this Code, as well as those of the Policy on the Handling of Reports of Breaches and of Social Concerns.

We guarantee the confidentiality of reports of bad practices and unlawful behaviour and of Social Concerns made in good faith through the compliance channel, and undertake not to engage, by any means, in any acts of retaliation against the reporting/complaining person.

An act of retaliation is understood as any act or omission that, directly or indirectly, occurring in a professional context and motivated by an internal or external report or public disclosure, causes or may cause the reporting person, in an unjustified manner, financial or non-financial damage.

If the employee has reasonable grounds to believe that the content of their report cannot be resolved internally, or if they have well-founded fear that they may be the victim of retaliation, they may resort to an external report or public disclosure, under the terms of Portuguese Law no. 93/2021 of 20 December.



08. FINAL PROVISIONS

This Code is an integral part of the anti-bribery management system implemented in accordance with NP ISO 37001, associated with the “Regulatory Compliance Programme” (“PCN”) implemented in compliance with the Portuguese General Anti-Corruption Regime. Compliance with it does not exempt strict adherence to all policies, regulations, work instructions and other internal rules.

This Code enters into force immediately upon publication and shall be reviewed every 3 years, or whenever justified, and shall be published on jp.hub and on the official website within 10 (ten) days of its implementation and/or of its respective revisions.

The Code of Ethics and Conduct is updated periodically in line with new regulatory requirements, improvements resulting from compliance reviews, and best practices. Visit the website jp.ik to consult the current version.