

CODE OF *ETHICS AND OF CONDUCT*

VALUES ➤ TEAM ➤ ETHICS
QUALITY ➤ INNOVATION ➤ RESPECT
INTEGRITY ➤ TRANSPARENCY
SUSTAINABILITY

INDEX

1. INTRODUCTION	3
2. HUMAN RIGHTS AND LEGAL COMPLIANCE.....	5
3. SUSTAINABILITY AND RESPONSIBILITY	7
4. TRUST AND INTEGRITY	8
5. CONDUCT NORMS OF EMPLOYEES.....	10

1. INTRODUCTION

WHAT ARE THE OBJECTIVES?

- **TO PROMOTE OUR VALUES: TO BE ETHICAL** is one of Broliveira's values. We work as a TEAM, to provide a high QUALITY service, with integrity and mutual respect for clients, employees, competitors, and other partners. We are INNOVATORS and we fight for a sustainable future by creating solutions to meet new challenges.
- **TO PROTECT PRINCIPLES AND INSPIRE RULES OF ACTION:** this Code of Ethics and of Conduct (hereafter called Code) establishes a set of principles, values and rules of action for all managers and workers alike, regarding professional ethics; it takes into account the Decree-Law n.109-E/2021, of December 9, establishing the "Regime Geral da Prevenção da Corrupção" (general arrangement for the prevention of corruption).
- **TO SET A COMMITMENT WITH OUR PARTNERS:** we love good business, but not at all costs. We want to do business with organisations that respect human rights and the principles of labour law, take environmental responsibility and fight corruption. Thus, we promote compliance with the present Code with our business partners. This commitment of both parties is the guarantee of a trustworthy partner!
- **TO LEAD THE ACTION:** the present Code is a guide to Broliveira's way of action and of how all those who relate with the company shall act!

WHO IS IT INTENDED TO?

- The present Code applies to Broliveira's EMPLOYEES, who should acknowledge and comply with it, regardless of the job position.
- The present Code is also intended to all our business PARTNERS, in particular, clients and suppliers, to whom we request to commit with the values, principles and rules of action regarding professional ethics, as well as with the creation of a mechanism allowing to report any violation of it.

REVISION AND DISCLOSURE

- The Code comes into force from the date of its approval.
- The Code is revised every three years or whenever there are changes within the company that may justify the revision.
- The Code is published on Broliveira's site and made available in digital form to all personnel.

APPLICATION FOLLOW-UP

- All Broliveira's personnel are responsible for the implementation of the present Code; thus, all must know and understand it.
- Any person is entitled to reach to the company's Human Resources Department or the Legal Department, to request any clarification.
- The Management is the body responsible for its compliance and for solving any issue arising from any non-compliance, taking the measures it may deem adequate.

REPORTING OF IRREGULARITIES

- We are all responsible for reporting any conflicting behaviour or practice non-complying with the provisions of this Code.
- The reporting of occasional irregularities or offenses regarding the present Code may be addressed, in written, using the following channels: ¹
 - email addressed to canaldenuncia@broliveira.pt;
 - letter addressed to Assessoria Jurídica, Transportes Broliveira Lda., Rua das Areias, 17, 2490-124 Gondemaria (Ourém) - Portugal, with the indication "confidential".

CONSEQUENCES IN CASE OF VIOLATION

- When the agent is an employee of this company, behaviours contrary to the present Code are reprehensible in the context of the established procedure; depending on the degree of guilt of the offender and on the gravity of the offense, it may lead to the opening of a disciplinary procedure and the application of one of the following disciplinary sanctions: a reprimand; a registered reprimand; a financial penalty, loss of days of holidays, suspension from work with financial penalty and seniority; fair dismissal.
- Should a business partner, supplier, or client act in contrary of the provisions of the present Code, Broliveira will require the adoption of preventive actions to avoid such an act to be repeated in the future and will assess the occasional repercussion of such a fact on commercial relationships.
- The non-compliance with the norms of the Code can also lead to the administrative or civil accountability of the offenders and, depending on the seriousness of the offense and of the offender's guilt, it will lead to criminal sanctions.
- The crimes of Corruption and Related Offenses referred to in the present Code are punishable, according to the legal framework, with fines and prison sentences to a maximum of up to 12 years.
- The Legal Department will issue a report for each offense committed, in which it will record the rules violated, the sanction applied, and the measures adopted or to be adopted by Broliveira.

¹ The reception and processing of occasional irregularities follow the REGIME GERAL DE PROTEÇÃO DE DENUNCIANTES DE INFRAÇÕES (regulation to protect whistle-blowers), governed by the law n.º 93/2021, of December 20.

2. HUMAN RIGHTS AND LEGAL COMPLIANCE

RESPECT FOR HUMAN RIGHTS

- We are committed to respect and promote human rights and to ensure the compliance with the principles enshrined in international conventions, such as the Universal Declaration of Human Rights, Conventions from the International Labour Organization (ILO) and the Charter of Fundamental Rights of the European Union.
- Human rights observed by Broliveira, and expected to be shared by its Partners, include:

- **Child Protection and Child Labour Ban**

We recognize children's human rights, such as the right to health and to education; we follow the provisions of the ILO about the minimum age of admission to work, and the worst forms of child labour that shall not be performed by children or teenagers under the age of 18 years old..

- **Decent Work and Slave and Forced Labour Ban**

All workers have the right to work freely and under a valid work contract. We condemn slave labour, any form of forced or compulsory labour and the traffic in human beings.

We respect the conventions of the ILO about Wage Protection and the Duration of Work and observe the guidelines of Labour Right.

- **Diversity, Inclusion and Equality, with No Discrimination and No Harassment**

We value the diversity and the inclusion and do not tolerate any form of discrimination, regarding gender, race, colour, nationality, sexual orientation. We condemn any form of harassment and have approved the "Code of Good Conduct for the Prevention and Fight against Harassment at Work" that all should know and observe. We promote equal opportunities for all workers, especially regarding gender equality, labour for people with disabilities and workers from different nationalities.

- **Freedom of Association and Trade Union**

We recognise that workers are entitled to universal rights regarding freedom of trade union and collective bargaining. No worker can undergo any reprisal or any form of discrimination regarding his/her choice of trade union.

- **Health and Safety**

The Safety and Health of all personnel are a practice and a Broliveira's permanent concern. The ISO 45001 Certification allows Broliveira to manage health and safety aspects during its activities in a more effective way, as it considers accident prevention, the reduction of risks and the participation and well-being of its employees.

LAW COMPLIANCE

- We respect and care for the rigorous compliance to the legal rules and regulations applicable to our activity.
- Broliveira's employees and partners shall not violate the general law, specific regulations applicable or any International Convention, on behalf of the company and within the framework of its activity.

PROTECTION OF PERSONAL DATA

We respect and protect the privacy and the personal data of our personnel, clients, and suppliers according to our Policy of Protection of Personal Data, in compliance with the applicable laws, in particular, with the General Data Protection Regulation.

3. SUSTAINABILITY AND RESPONSIBILITY

SUSTAINABLE GROWTH

Broliveira's action, as well as the Partners with which it interacts, shall ensure economic, environment and social sustainability.

ENVIRONMENTAL RESPONSIBILITY

- Broliveira's acts in compliance with the laws regarding environmental protection, soil use, the preservation of biodiversity and the protection of natural habitats, where ecological, social, and cultural values are of great importance.
- We understand our environmental impact; by implementing the ISO 14001 environmental standard, we assume the principles and practices aimed at reducing it, especially, our carbon footprint and the use of energy and water.

SOCIAL RESPONSIBILITY

- We worry about and take measures to promote the satisfaction of our Employees, in particular, the practices of conciliation between professional, personal, and family life.
- We recognize our responsibility towards local communities and seek to contribute to social development, supporting programs conforming with Broliveira's values.

ROAD TRAFFIC RESPONSIBILITY

- The action of Broliveira's drivers on the road should promote traffic safety.
- The company has implemented the ISO 39001 standard, which means there is a set of measures aiming at reducing the risk of death or serious injuries related to road traffic accidents with our drivers, as well as with all other road users.

4. TRUST AND INTEGRITY

COMPETITION LAW

- Broliveira will observe the rules of the market, promoting loyal competition.
- Broliveira's personnel shall refrain from any behaviour that may be considered as an anti-competition practice in the market it operates.

PREVENTION OF CONFLICT OF INTERESTS

- Broliveira's personnel are banned from practicing any actions that may be considered, directly or indirectly, as a situation of conflict of interest arising whenever they have or could have, personal interest in a certain matter, and that may influence the fair and objective performance of duties.
- Broliveira's personnel are banned from performing any external professional activity, paid or not, that may interfere with their professional duties and/or Broliveira's activities or interests.

PREVENTION OF CORRUPTION AND RELATED OFFENSES ²

- Broliveira repudiates any practice of corruption, bribery, or related offenses, either passive or active, and other forms of undue influence or illicit conducts, imposing the rigorous compliance of such principles to all its relationships, internal or external, to private or public entities.
- All personnel shall comply with all applicable standards, national or international, in the fight against Corruption and Related Offenses; any behaviour that may consubstantiate the practice of a crime of corruption or any other related offense foreseen by the law is expressly forbidden. More specifically, it is expressly forbidden to all personnel:
 - to engage on any advantage or offer as a compensation for preferential treatment by any third party, to influence an action or decision.
 - to influence decisions of business Partners in any illegal form or that may seem to contradict applicable standards.
 - to obtain any benefit or advantage to Broliveira, its personnel or its Partners, through non-ethical practices or practices contrary to the duties of the job position, namely through the practice of corruption, undue collection or advantage or traffic of influences.
- Offers can only be accepted or made whenever they can be framed within adequate social conducts and according to customs and traditions. A benefit is considered socially acceptable if it is offered as token of education and good manners; if it conforms to local customs and traditions, in the way that such offer is made within the framework of the professional activity and has no intention or purpose of persuading or obtaining a preferential treatment or illegitimate advantage from the recipient, or to unduly influence his/her behaviour.

² The crimes of corruption, undue collection or offer, embezzlement, graft and corruption, extorsion, abuse of power, evasion, trading in influence, money laundering or fraud to obtain or misappropriate subsidies, grant aids or credit, established in the Portuguese Criminal Law (Law 34/87, of July 16), in its last update. Also included are other laws that, by their nature, should be considered.

- Besides being susceptible to originate disciplinary sanctions prescribed on the Labour Code, any action taken in violation of the law and regulations applicable to the fight against corruption can also originate criminal sanctions for the regarded Employee and for the company (examples: financial sanction and prison sentence).

FIGHT AGAINST MONEY LAUNDERING AND THE FUNDING OF TERRORISM

Whenever Broliveira's employees suspect or have reason enough to suspect that certain funds or other goods, regardless of the amount or value involved, originate in criminal activities, or may be related to money laundering or funding of terrorism, they shall report such suspicion.

5. CONDUCT NORMS OF EMPLOYEES

THE USE OF GUNS AND THE CONSUMPTION OF ALCOHOL AND DRUGS IS STRICTLY FORBIDDEN

It is strictly forbidden to Broliveira's personnel, as well as to all who visit our premises, the use of guns, the intake of alcohol and the use of narcotic drugs while at work.

ENSURING INFORMATION AND CONFIDENTIALITY

- All Broliveira's personnel shall protect confidentiality of information they have access to while performing their duties and are prohibited from using it to get any kind of advantage for themselves or third parties.
- The personnel must refrain from disclosing images or texts on social media that may, directly or indirectly, put Broliveira's image at risk or of any other people or entity with whom the company has some relationship, namely, the personnel, suppliers and/or clients.

IMAGE AND PRESTIGE SAFEGUARD

All personnel shall have a clean appearance, wear clothes with good judgement, moderation and in an adequate manner while performing their duties, as they must never forget they are the company's image.

RESPONSIBILITY AND PROTECTION OF THE COMPANY'S ASSETS AND EQUIPMENT

Personnel must perform their duties in a responsible and professional manner, protecting the premises and the working equipment they are allocated.

HEALTHY RELATIONSHIPS AMONG EMPLOYEES

- Relationships among personnel shall be driven by correctness, courtesy, and treatment equality, as no form of harassment, discrimination, or lack of respect among personnel is acceptable.
- All personnel shall try to work as a team, with humility and promoting a culture of mutual assistance.

³ This includes personal digital data or other data considered private, information about ongoing businesses, information about technical proficiency, work methods and management, as well as any other information regarding any finished or ongoing project, of which knowledge is limited to Broliveira's personnel while performing their duties or related to them.