



**CODE of
CONDUCT**

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This Code of Conduct establishes a set of ethical and professional principles and values that must be observed by all **Employees** of Arneg Portuguesa, without prejudice to other rules of conduct that may be applicable due to the performance of their functions.

Chapter I

Scope of Application

Article 1

(Scope)

1. The following Code of Conduct applies to all **Employees** of Arneg Portuguesa (hereinafter referred to as "**ARNEG**"), defined as such all those who perform activities at **ARNEG**, in any capacity, namely the members of the corporate body, workers and other **Employees** (hereinafter referred to as "**Employees**").
2. The scope of this Code of Conduct and its application does not exempt the application of other rules of conduct or ethical standards applicable to specific functions, activities or professional categories by virtue of the law or rules of any other nature.

Chapter II

General Principles

Article 2

(General Principles)

In the exercise of their activities, functions and powers, the **Employees** must always act, in accordance with **ARNEG's** best interests, taking into consideration its quality, environmental and safety policies, and with due regard for the principles of legality, good faith, responsibility, transparency, loyalty, integrity, professionalism and confidentiality.

Article 3

(Equal treatment and non-discrimination)

1. **Employees** must not adopt discriminatory behaviours, particularly those based on race, sex, age, physical ability, sexual orientation, political opinions or religious convictions.
2. **ARNEG** and its **Employees** must adopt the highest standards of integrity and individual dignity and must denounce any practice which may contradict the provisions of the previous paragraph.

Article 4

(Diligence, efficiency and responsibility)

1. The **Employees** must always fulfil the tasks they may be entrusted with, in the exercise of their functions, with care, efficiency and responsibility.
2. The performance of the **Employees** will be assessed on the basis of their own merit and of the results obtained in the exercise of their functions, taking into account the fulfilment of their duties.

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Chapter III

External Relationships

Article 5

(Duties of information and confidentiality)

1. The **Employees** must keep absolute secrecy concerning the information they may be aware of due to the exercise of their functions and which, by its nature, may affect the image, the interests or businesses of **ARNEG**, in particular those of a confidential nature.
2. The information referred to in the previous paragraph include but is not limited to personal data or other undisclosed data, information upon business opportunities or ongoing businesses, information upon technical skills, working methods and project managements developed by **ARNEG**, as well as information concerning any project carried out or under development, which are exclusively known to the **Employees** in the exercise or by virtue of their functions.
3. Except when mandated, the **Employees** must refrain from making public statements, on their own initiative or upon request of third parties, namely when those statements may jeopardise the image of **ARNEG**, in particular by making use of social media and social networks.

Article 6

(Professional Relationship)

1. Without prejudice to the provisions concerning the performance of several functions or the exercise of a corporate position, and except upon prior authorisation from the Management, no **Employee** shall exercise other professional activity, outside **ARNEG**, to the extent that such exercise interferes with the fulfilment of his/her duties as **Employee**, or in entities whose purpose or activity may collide, interfere or harm the interests or activities of **ARNEG**.
2. For the purposes of the provisions of the previous paragraph, the **Employees** must previously inform the Management about any other professional activities they perform, or intend to perform, as well as any possible situations preventing or colliding with the exercise of their functions at **ARNEG**.

Article 7

(Duties of loyalty, Independence and responsibility)

1. The **Employees** must make a commitment of loyalty, striving to protect their credibility, prestige and image in all situations, acting with honesty, impartiality, determination and objectivity.
2. The **Employees** must always bear in mind **ARNEG's** best interests, acting with impartiality, ethics and professionally, refraining from adopting any behaviours aimed at benefiting any third parties, due to personal interests or third parties' interests, and must be driven by the highest standards of honesty, integrity and transparency, in the exercise of their functions.
3. The **Employees** must act with respect for the duties inherent to their functions, using all means available exclusively within the scope of and for the exercise of their functions.

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Article 8 (Competition)

ARNEG shall observe the rules of the market, promoting fair competition and refraining from using any restrictive or unfair practices of competition.

Article 9 (Legal compliance)

1. **ARNEG** shall comply with and ensure strict compliance with the legal rules and regulations applicable to its activities.
2. The **Employees** must not violate the general legislation and the applicable specific regulations, on behalf of **ARNEG** and within the scope of their activity.

Article 10 (Conflict of interests)

Any **Employee** who, in the exercise of his/her functions and competences, is summoned to intervene in processes or decisions in which financial interests or other interests of such employee or of other natural or legal person or entities related to him/her are or may be at stake, shall inform **ARNEG** of the existence of such relationship and shall refrain from participating in such processes or from influencing or participating in such decisions.

Article 11 (Relationship with third parties)

1. The **Employees** must not accept or make any payments or otherwise act in such a way as to favour their own interests, or those of third parties in their relations with clients and suppliers, and any form of corruption practice is forbidden.
2. The **Employees** shall refuse to obtain or to make available any information through illegal means.
3. No offers to third parties shall be made, on a personal level, and the **Employees** must comply with the procedure established by **ARNEG**, on this matter.
4. Gifts from third parties must be refused if there are any suspicions that they are aimed at reaching objectives that are contrary to the provisions of this Code of Conduct, namely if they are intended to influence **ARNEG** or the **Employee** in particular.

Article 12 (Relationship with suppliers)

1. **Employees** must honour the commitments made on behalf and in representation of **ARNEG** with the suppliers of products or services and must demand from them a total fulfilment of their obligations, as well as compliance with the good practices and rules inherent to the activity concerned.
2. The choice of the supplier shall be made based on impartial and transparent criteria, without privileges or favours and avoiding, where possible, exclusivity situations.
3. When selecting suppliers and service providers, the **Employees** shall bear in mind that, besides the economic and financial indicators, the market conditions and the quality of the products or services, they shall also take into consideration the supplier's ethical behaviour, in particular compliance with this Code of Conduct.
4. The **Employees** shall raise the awareness of suppliers and service providers for the compliance with ethical principles in accordance with this Code of Conduct.

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Article 13

(Relationship with clients)

1. **ARNEG** shall ensure equal treatment and non-discrimination to all clients.
2. **ARNEG** shall maintain high levels of technical skills, providing a quality service and acting with efficiency, diligence and impartiality.
3. **Employees** shall maintain proper standards of correction, politeness and affability in their relationship with clients.

Article 14

(Relationship with social media and social networks)

1. All information provided to social media and in social networks must be of informative nature and true.
2. All information provided to social media or in social networks must contribute to dignify the image of **ARNEG** and increase the company's value.
3. The **Employees** may only provide information concerning **ARNEG**, after the prior approval of the Management.

Article 15

(Relationship with the community and the environment)

ARNEG must assume a socially responsible attitude within the Community and in relation to the public opinion and the market, and must adopt a conscious environmental sustainability policy.

Chapter IV

Internal Relationships

Article 16

(Relationships between Employees)

1. The **Employees** shall observe the best principles of respect for integrity and dignity in their relationship with each other and **ARNEG** shall promote harmony in the relationships between the **Employees**, punishing harassment practices, which constitute a serious disciplinary infringement.
2. The **Employees** have the duty to report any practices of harassment, reporting the facts as provided for in this Code.
3. **ARNEG** undertakes not to impose disciplinary sanctions on the **Employees** who complaint and/or are witnesses of situations of harassment based on declarations provided by them in the respective disciplinary or inquiry procedures, except they act maliciously.

Article 17

(Professional development)

The **Employees** shall seek to continuously perfect and update their knowledges, with the purpose of maintaining or improving their professional skills

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Chapter V

Implementation

Article 18

(Commitment to comply with this Code of Conduct)

All **Employees** are subject to this Code of Conduct, from the first moment of performing their functions, and are required to strictly comply with it.

Article 19

(Reporting irregularities)

The reports of possible irregularities or infringements to this Code of Conduct, in particular bad practices, including harassment at work must be sent in writing, either on paper and addressed to the Human Resources Department, or digitally using the reserved email address: conduta@arneg.pt